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EVALUATION OF THE CITIZENS SIGNPOST SERVICE



FINAL REPORT

for

**The Directorate General Internal Market (DG MARKT)
The European Commission**

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0. EXECUTIVE SUMMARY

0.1 OVERVIEW OF THE EVALUATION

For the Internal Market to deliver its full potential EU citizens need to know their rights and how to exercise them within the EU legislative and administrative practices that have been put into place. The Citizens Signpost Service (CSS) is one of the initiatives that have been set up by the European Commission's Internal Market and Services Directorate General to provide practical advice and information to citizens and businesses. CSS provides access to legal experts who cover all 25 Member States and can respond to enquiries relating to citizens' practical problems (often related to living, working or travelling in another EU Member State) within the EU in any one of the 20 Community languages. Citizens may contact the service via telephone, e-mail or on-line and may request a response within 8 working days by telephone or email. CSS experts provide assistance by clarifying the EU law related to the citizen's problem and pointing to the organisations at the national and/or European level that can help to solve the problem.

In August 2005, the European Evaluation Consortium (TEEC) was contracted by DG Internal Market and Services to carry out an evaluation of CSS. The purpose of the evaluation was to provide an in-depth analysis of the achievements and potential of CSS to help Commission services to decide upon future orientations and possible improvements. As lead TEEC contractor, The Evaluation Partnership Limited (TEP) carried out this assessment, which involved a review of the operation and management of the service both by the Commission and the responsible contractor and consideration of the degree of complementarity between CSS and other similar services at the EU level such as SOLVIT, Europe Direct, Eurojus and the European Consumer Centres. Examples of the provision of information and advice services at the Member State level were also taken into account. Interviews were held with the Citizens Advice Bureaux in the UK and Poland, and Comhairle in Ireland.

The views of citizens making use of the service were, of course, critical to this assessment. An on-line satisfaction survey was carried out in 8 Community languages (English, French, German, Spanish, Italian, Czech, Polish and Hungarian). The survey generated 254 responses to questions concerning awareness and usage of CSS to satisfaction and value-added. The detailed results of the survey are presented in **Annex 5.5**. In addition to the views of users, TEP was asked to check the quality of answers provided by CSS and the effectiveness and efficiency of the process. Over a period of 3 months, TEP made 12 mystery enquiries via Europe Direct (telephone and e-mail) and entered 62 mystery on-line enquiries via the Citizens Signpost Service website. Enquiries were based on typical questions posed to the service and CSS experts were not informed that a mystery survey was taking place. The detailed results of the mystery survey are provided in **Annex 5.6** to this report.

0.2 SUMMARY CONCLUSIONS

Detailed conclusions on the relevance, effectiveness, efficiency and coherence of the service are provided in Chapter 4 of this document. The purpose of this section is to highlight the key conclusions and recommendations that are essential to understand the strengths and areas for improvement of the Citizens Signpost Service, as it is currently being provided, and the types of changes that will be required to enhance the service in the future.

0.2.1 STRENGTHS OF THE SERVICE

- **Citizens Signpost Service (CSS) is highly valued by its users.** Over **77%** of respondents to a user satisfaction survey indicated that they believe that **CSS is a very important to EU citizens. Circa 81% would use CSS in the future and 83% would recommend CSS to family and friends.**
- **CSS users are satisfied with the service that they receive.** There are very few complaints and 69% of users who responded to an evaluation survey agreed that they were satisfied or very satisfied with CSS. Seventy percent expressed satisfaction with the relevance and accuracy of CSS. Users are particularly happy with the fact that they receive a personalised response and, for the most part, report that advice is clear and jargon-free.
- **CSS is unique; it fills a distinct gap in information and advice services covering the whole European Union.**
 - No other Commission service provides advice and signposting on Internal Market legislation by legal experts, in 20 languages and covering all 25 Member States;
 - No other national¹ public or voluntary service provides a similar, free, independent service;
 - In addition, **72%** of user respondents to a survey indicated that they would find it difficult to find the type of service elsewhere.
- **Citizens Signpost Service is a high-quality service.** Quality is confirmed by monitoring carried out by the contractor, DG Internal Market and Services and tests on the handling of a sample of enquiries carried out by the evaluation team.
- **The speed of CSS responses is rapid and the contractual deadline (3 working days) is consistently met.** Most other EU and national level services reviewed in the evaluation do not match this speed of delivery. The short deadline for responses allows citizens to take fast action and helps to

¹ As confirmed by national citizens advice services.

ensure the relevance of advice provided. From an operational point of view, deadlines are workable for the CSS experts and the contractor, and they provide DG Internal Market and Services with assurance that enquiries will be answered quickly.

- **Access mechanisms available to citizens (e-mail, telephone and on-line) are appropriate, as are response mechanisms (e-mail and telephone).**
- **It is appropriate to outsource the delivery of CSS.** The Commission could not provide CSS at the same level of cost with the same type of expertise² if the DG was required to use internal staff.
- **The CSS database is user-friendly and effective** allowing:
 - the contractor to perform its tasks efficiently and effectively;
 - the Commission full transparency of the process;
 - the opportunity for other EU and national services to input enquiries directly into the system.
- **CSS fits clearly within its political environment.** CSS is in-line with the Commission's communication strategy of dialogue with citizens and with the interest of DG Internal Market and Services. CSS provides citizens with a service that can help them take advantage of what the Internal Market has to offer.

CSS OPERATIONAL PROCESS

Citizens Signpost Service functions efficiently. Since the launch of the service in July 2002, a number of modifications have been made, which allow:

- **confidence that the majority of enquiries are of high quality;**
- **the Commission and the contractor to have a high level of control;**
- **the Commission and the contractor to track the handling of each enquiry from start to finish;**
- **appropriate reporting mechanisms and interaction between the contractor and the Commission;**
- **that no major issues need to be addressed to enhance the process of handling with enquiries.**

As an operational process, CSS is in a mature state and is ready for the next stage of its development.

² Part of the added value of the current approach is that CSS experts have good knowledge of the national bodies to which they can signpost citizens for further assistance with problem-solving. Also, they can provide an independent service.

0.2.2 AREAS FOR IMPROVEMENT

CSS is a highly efficient service. However, to date the level of awareness and take up of the opportunity for legal advice and signposting has been very limited. In 2005, the average number of enquiries per month was 473 and circa 20% of these were considered to be ineligible. The number of enquiries is very low for a service that aims to target the (mobile) EU general public. This is an area of serious concern, which undermines the effectiveness and impact of CSS, and limits the added value that CSS could, in theory provide.

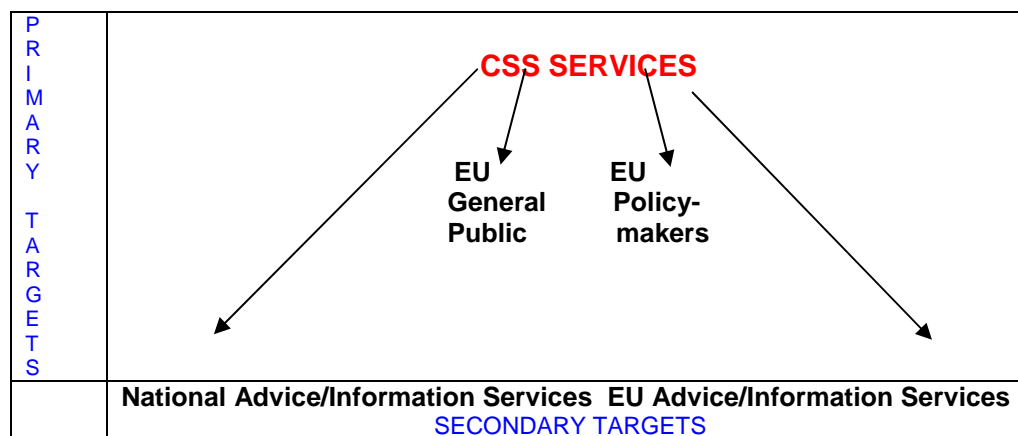
Just as concerning, is that CSS does not address the needs of its other primary target group - those responsible for Internal Market policy-making. This issue is already known within the DG and relates to the reliance on the Internal Policy-Making Initiative to deliver this mechanism.

Primary customers (current market place)

- EU citizens;
- the Commission's EU Internal Market policy-making function

Secondary customers (market place for development)

- local and national information and advice services;
- other Commission coordinated information, advice and problem-solving services;



The next phase of development is to focus on how to tackle these fundamental weaknesses, by focussing on 4 main areas:

- Strategy
- Customer Service
- Operational Management
- Partnerships and relationships

STRATEGIC ISSUES

- CSS meets its first operational objective. This objective states that CSS should provide citizens with practical information in response to enquiries as regards the exercise of their Internal Market rights and on the next step to be taken by citizens in overcoming problems, which they may encounter in the exercise of these rights. **However, this operational objective is too general. The lack of targets and long-term goals weaken the development of the service.**
- **CSS does not meet its second operational objective:** CSS does not help the Commission to form a better understanding of the operation of the Internal Market in practice, and to identify issues which may still need to be resolved in order to improve its functioning. CSS offers:
 - an important mechanism for dialogue with citizens;
 - a rare opportunity to raise citizens awareness of the benefits of the EU;
 - a vast amount of data that could be highly relevant to policy making.

Unfortunately, these opportunities to create impact are not being maximised. How to address this objective needs to be considered by unit A4.

- **The services provided by CSS have not been sufficiently differentiated from services available elsewhere.** Lack of distinctness has a negative impact on the ability of CSS to increase awareness of its services:
 - the **high number of ineligible³ enquiries** received confirms that citizens do not understand what the service has to offer. Over 70% of ineligible citizens' questions were outside scope because they did not relate to the Internal Market;
 - most members of the general public do not understand the term 'Internal Market', and are **unfamiliar with the scope of EU Internal Market legislation**;
 - lack of distinctiveness has also **reduced the ability of CSS to leverage collaborative opportunities** of mutual benefit with other Commission and national services;
 - **that CSS is a service to the Commission as well as to the general public has not been sufficiently articulated** and is not included within the operational priorities and achievements of the service.

³ The new version of the web site launched in March 2005 has resulted in a decrease in the proportion of ineligible enquiries (see section 3.3.2).

- **The customers of CSS have not been sufficiently differentiated and targeted.** The positioning and operational focus of CSS activities has been to provide signposting and legal advice to the EU general public. However, this broad group has not been segmented and effectively targeted and the 3 other potential customers of the service have not been sufficiently articulated and consequently their needs have not been addressed, as follows:
 - National information and advice services
 - EU coordinated information, advice and problem-solving services
 - EU Internal Market policy-makers

CUSTOMER SERVICE ISSUES

- **The presentation of CSS is not sufficiently user-friendly.** The service provided by CSS needs to be more clearly communicated:
 - a clear description of the service is required whenever CSS is advertised;
 - the name 'Citizens Signpost Service' is not understandable and does not communicate the full scope of the service;
 - the term signposting is unclear;
 - the provision of legal advice is not indicated by the name of the service.
- **CSS is not sufficiently user-oriented.** This relates to issues of eligibility, access and the format of responses:
 - between July 2002 and December 2005, **27%⁴ of all enquiries were judged to be ineligible**, resulting in the sending of a standardised e-mail from the CSS database;
 - this practice is inappropriate given the potential for CSS to improve citizens' views of the EU (confirmed by 55% of respondents to the user survey) and current scepticism among the EU general public about the added value of the EU institutions;
 - the definition of the service on the CSS web site needs to be amended to include questions from other public or voluntary sector advice services on behalf of citizens. The possibility of

⁴ Following changes to the CSS website in early 2005, the average % of ineligible enquiries decreased to 20%.

extending the intermediary model in the CSS database to these other services should be considered.

- **CSS is difficult to find (this is confirmed by the user survey) and special emphasis needs to be placed on:**
 - ❖ **improving and increasing links via the Internet** (the main enquiry access route) and the attractiveness to Internet search engines as the majority of enquiries are made via the Internet. There are relatively few links from other relevant services at the national and EU level to CSS;
 - ❖ the **content of the web site** needs to be enhanced to make the service more attractive;
 - ❖ a number of relatively easy modifications which could enhance the **on-line enquiry submission form**.
- **Although citizens welcome a personalised approach to their enquiry, there is a lack of standardised personalised format in responses to CSS citizens.** Some responses are written as a letter with a salutation and sign-off, whereas others appear to be less professional and service orientated because they read like an entry into a database.
- According to the contract, answers to citizens must be of uniform quality. Quality assurance by ECAS and the Commission suggest that answers to circa 10% of answers could possibly be enhanced, which would allow this contractual requirement to be met. The potential impact of encouraging CSS experts to ask citizens for further clarification needs to be assessed, as does the impact of greater collaboration between experts representing different Member States.

OPERATIONAL ISSUES

- **The cost structure of the contract to provide CSS needs to be revised.** Since inception, the number of eligible enquiries to CSS has never been more than 5,000 even though the Commission pays a fixed fee for answers to the first 6,000 eligible enquiries. Thus the initial fixed-fee threshold is too high.
- **The amount of human and financial resources allocated within DG Internal Market and Services has been very modest.** There will be a need to reinforce these aspects if significant additional efforts are to be placed upon maximising the feedback to policymaking of CSS and increasing awareness of the service – both of which are crucial to the future of the service.

- **The emphasis placed on members of the DG Internal Market and Services team carrying out quality assurance on the work of the experts should be refocused in the next phase of CSS development** given that:
 - there are very limited human resources within the responsible unit (A4);
 - one of the two CSS objectives is not being met: the need for CSS to inform the Commission on how the Internal Market is functioning in practice.
 - detailed quality assurance is performed by the contractor;
 - the DG has access to the CSS database at anytime;
 - the need to focus on how to increase awareness of the service is of greater concern.
- **The frequency and content of training sessions for CSS experts could be enhanced and this would add value of the service.** Increasing the frequency of meetings to twice per annum and allowing greater interaction during training sections would help to increase and improve communications between individual experts. Organising training via workshop-style rather than lecture-style sessions is recommended.

PARTNERSHIP AND RELATIONSHIP ISSUES

- **Internal and external awareness of the service is extremely low and needs to be significantly enhanced.**
 - **The overwhelming majority of the target group (mobile) EU citizens have never heard of CSS.** Yet, unless people are aware of a service it has almost no impact. Consequently, to date usage of the service has been limited to a minority who are familiar with EUROPA and the EU Institutions. Last year, there were less than 6,000 eligible enquiries to the service.
 - To date **human and financial resources allocated to awareness-raising and promotion** within DG Internal Market and Services have been seriously lacking.
 - **CSS has not benefited from access to the client-base, distribution and promotion mechanisms of existing information and advice networks⁵** within the Member States, including partly those coordinated by the Commission as well as by national organisations.

⁵ This approach has been taken by other EC services (for example EURES, ERA-MORE) and has facilitated broader access and uptake of services.

- With the exception of SOLVIT, **CSS has not benefited from the potential for joint promotion and public relations with other similar services**, for example Europe Direct, Eurojus and national level services.
- **CSS has potential to add value to generalist information and advice services** at the national level (for example services to expatriates and citizens advice services) and the EU level (other Commission coordinated services). CSS needs to be positioned and marketed as a service, which can provide legal advice and interpretation of EU Internal Market legislation to other free advice services.
- **The potential synergies and mutual benefit of collaboration with other national level and Commission coordinated services has not been fully exploited**, for example:

Europe Direct: there is scope to increase the degree of synergy in the area of presentation and promotion strategies and activities, which will lead to cost efficiencies. There is a link but insufficient description of CSS on the ED web site, which is a problem given that Europe Direct is the earpiece of CSS.

SOLVIT: there are opportunities for joint training on legal updates and developments on EU Internal Market legislation, also SOLVIT experts could make more use of CSS to provide them with legal advice.

Eurojus: there are opportunities for joint legal training, and for CSS to provide back up in Member States which do not have access to Eurojus consultants, which could be promoted on the web sites of the EU Representations.

EURES: CSS could provide specialist legal advice to the EURES network as well as advice to EURES clients once they have found a job in another Member State.

ERA-MORE: CSS experts could provide specialist legal advice to members of the ERA-MORE network.

National level services: CSS could act as a specialist legal advice unit that could be contacted by national Citizens Advice Bureaus and expatriate services.

RECOMMENDATIONS

It is recommended that the next phase of CSS development is focused on the following points. These recommendations, as specified in the Terms of Reference, are formulated in order to improve the tool and adapt it to the changing needs of the citizens. However, it is understood that certain aspects will need to be considered over the longer term, after the expiry of the current contract in 2007.

In addition, while this section aims to highlight the way ahead for the development of the service, a significant increase in human and financial resources allocated to CSS within DG Internal Market and Services is required to allow the potential outlined hereunder to be realised.

STRATEGY DEVELOPMENT

- **The first issue to be addressed is that the Citizens Signpost Service (CSS) needs a Strategic Plan. The plan should include a mission statement, goals, objectives, targets and indicators that are SMART (specific, measurable, achievable, realistic and timely) to guide the next steps of CSS development.** To develop a strategic plan, those responsible for CSS need to:

Define the main services currently provided by CSS and to position and market CSS services according to each level of classification. The title Citizens Signpost Service is general and is not able to describe the full range of services that CSS provides. Currently, the formal presentation of CSS tends to describe the service according to this title (general level 1) and occasionally gives more insight into the type of services (more specific level 2). Whereas, a more specific definition of the full range of services (3rd level of classification) is also required. This will make it easier for potential users to understand the full range of services that CSS provides, and for the DG to identify how to target the users of these specific services.

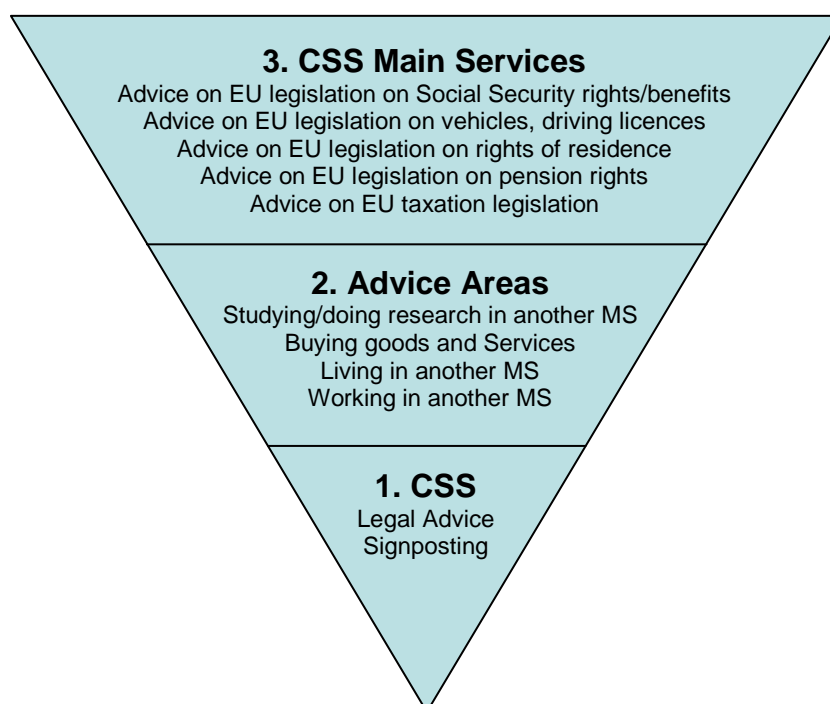
Description of services

Level 1: Legal advice and signposting...

Level 2: ...covering living, working, travelling, studying in other EU MS

Level 3: ...including EU social security, pensions, vehicles, taxation rights

These levels are highlighted in the below diagram (it should be noted that the list of services described is not exhaustive).



- **Identify the customers who require these services, the needs that they want to meet and the location/opportunities to present CSS to them.** The differentiation of services and target customers will likely highlight new possibilities for the name and branding of the service, which need to be taken into account in materials and activities undertaken to promote of the service.

For each issue that is dealt with by CSS there are a number of different services that can be offered to different types of customers. Thus, each customer group needs to be segmented according to the type of service that it will receive.

- **Define the service delivery plan** this is likely to be based on the current contract, but roles within the DG Internal Market and Services team and aspects of the service provided by the contractor may need to be redefined to allow the differentiated services to be delivered to their target groups. The plan is likely to include the following elements.

ISSUE	TARGET GROUPS	TOUCH OPPORTUNITIES	SERVICE REQUIRED	RESOURCE REQUIREMENT	PERFORMANCE MANAGEMENT
Specific service provided by CSS	Who is interested in this service?	How to contact the target group	What do the group need?	What is the cost of promoting and meeting the need?	How do we know that the need has been met?

- **Define networks and promotion opportunities:** it is recommended that the key strategic networks that CSS needs to access are mapped and targeted. This strategy should allow CSS to achieve goals set for service delivery in terms of target groups met and advice and signposting delivered. Once key customers have been segmented those responsible for CSS can identify those individuals (EU policymakers) and groups (EU general public) which whom relationships need to be developed.
- **Manage performance appraisal and objective setting:** there needs to be a review and feedback loop to ensure that progress is measured, lessons are learned and operational goals and objectives are met or adapted over the course of time.

CUSTOMER SERVICE DEVELOPMENT

- **The presentation of CSS needs to become more user-friendly and following issues need to be addressed:**
 - CSS should be renamed so that its name better describes the service that it provides. Alternatives to the word signposting need to also be considered;
 - If it is not possible to rename the service in the short-term, the services on offer need to be defined in a user-friendly slogan or phrase which is used whenever and wherever the service is presented;
 - The possibility of a common brand or message which describes that the Commission can help citizens and businesses with their EU enquiries needs to be discussed with other relevant services, SOLVIT, Europe Direct and Eurojus;
 - Examples of typical enquiries and how they are addressed need to be provided on the CSS web site;
 - The scope of EU Internal Market legislation should be presented on the CSS web site;
 - Personal testimonies and case studies need to be presented on the CSS web site and in the new CSS newsletter.
- **CSS needs to become more user-oriented**
 - The service needs to be brought to the customers, for example, links on internal and external web sites, and opportunities to increase hit rates and visibility on Internet search engines;
 - The format of responses to enquiries needs to be standardised so that a more professional approach is taken, and all responses include a personal salutation and sign-off;

- The concept of eligibility needs to be better defined. CSS should describe that it accepts enquiries on behalf of citizens from other public or voluntary sector information and advice services, and steps should be taken to allow their enquiries to be included in the intermediary model;
- The approach to dealing with enquiries, which do not relate to Internal Market legislation needs to be revised. A personalised message needs to be provided and efforts should be made to signpost when it is not possible to provide legal advice;
- The following modifications are required to the on-line enquiry form/database:
 - ❖ definitions of residence need to be added;
 - ❖ the way to encode telephone numbers needs to be standardised;
 - ❖ a second e-mail address field needs to be added to reduce e-mail address error;
 - ❖ the time zone for response times by telephone needs to be added.
- The impact of allowing CSS experts to contact citizens whose enquiry is unclear, before sending a response, needs to be tested. It is anticipated that this should enable responses to better meet users' needs and may decrease variations in the quality of answers. If adopted changes may be required to the CSS database to allow interactions to be tracked.
- In the longer term, **face-to-face discussions should be held with those responsible for national and EU citizens information and advice services, as well as EU Internal Market Policymakers.** Meetings should be used to present the services provided by CSS and to how these services can be best adapted to meet their needs. While this seems an immense task for the responsible unit, it is suggested that a step-by-step approach is taken so that progress is slowly made in this area. There are significant benefits to be reaped in terms of raised awareness and usage of the service.

OPERATIONAL DEVELOPMENT

- **The cost structure of the contract for CSS should be revised and the fixed-fee threshold for eligible enquiries should be lowered.** There is no justification for the threshold to be set at higher than 5,000 eligible enquiries. However, if suggestions for changes to the scope of the service are taken on board, these need to be taken into account in the way that cost is defined.
- **The content of the contract for the delivery of CSS is revised to take into account recommendations on:**
 - the uniformity of content quality, and format of responses;

- the increased frequency of training of CSS experts;
 - opportunities for greater collaboration between CSS experts;
 - the opportunity to request additional clarifications from citizens.
- **A targeted approach is required for promotion so that activities focus on achieving goals set by a CSS Strategic Plan.** It is recommended that:
 - options to share promotional costs and activities with other similar Commission and national services are explored;
 - the amount of human and financial resources allocated to promotional activities is increased to reflect goals set;
 - public relations professionals are used to assist with the generation of success stories and EU media coverage;
 - e-mail responses to citizens include a promotional message encouraging citizens to tell others about the service;
 - a publicity event is organised involving debates on Internal Market legislation, personal testimonies of EU citizens, information sessions from national information and advice services.
 - **Core management team activities need to be restructured to include the need to meet the objective of informing the debate on the operation of the Internal Market in practice.** Further consideration is required as to how best to solve this issue.

PARTNERSHIP AND RELATIONSHIP DEVELOPMENT

- **It is recommended that contacts and synergies with the following services⁶ are further strengthened to agree the action that is required to maximise the mutual benefit of CSS and their services:**

Europe Direct: discussions need to focus on:

- options for joint promotion;
- increased presentation of CSS on the Europe Direct web site;
- the implications of Europe Direct operators answering enquiries and how this should best be developed to create a win-win situation.

SOLVIT: discussions need to focus on:

- options for joint training on legal updates;
- options for greater uptake of the service provided by CSS to support the work of SOLVIT agents.
- options for the take up of CSS signposting and support by SOLVIT clients

Eurojus: discussions need to focus on:

⁶ It is noted that this is a two-way process which requires the collaboration of those responsible for other similar services.

- options for promotion of CSS via the EU Representations (for example on their web sites, particularly in those countries without Eurojus consultants)
- options for joint training
- options for strengthening operational links between CSS and Eurojus;

EURES: discussions need to focus on:

- presentation of CSS to the EURES network
- promotion of CSS via the EURES network
- options for the take up of CSS legal support by the network
- options for the take up of CSS signposting and support by EURES clients

ERA-MORE: discussions need to focus on:

- options for the presentation of CSS to the ERA-MORE network
- promotion of CSS via the ERA-MORE network
- options for the take up of CSS legal support by the network
- options for the take up of CSS signposting and support by ERA-MORE clients

- **National advice services need to be mapped and meetings need to be held with those responsible⁷ to identify the validity of various options for mutual support** – CSS accesses national client-base and distribution network and national services get support in their work:

- The provision of legal updates on EU Internal Market legislation
- The opening of CSS legal advice to provide support and back up to national level services
- The possibilities for national level offices to become EU flagship branches

⁷ For the time being it is likely to be more realistic to focus on those services contacted by the evaluation team, who have already expressed an interest, due to the lack of available human and financial resources within Unit A4.

1. INTRODUCTION

1.1 THE FINAL REPORT

This document is the **Final Report** made by Evaluation Partnership Limited (TEP), as authorised representative of The European Evaluation Consortium (TEEC) EEIG, to Directorate General Internal Market (DG MARKT) on the Evaluation of the Citizens' Signpost Service (CSS).

The evaluation of the Citizen's Signpost Service was launched at a start-up meeting on 22 July 2005 and has been undertaken according to a four-phase work plan over seven months. The **Final Report**, this document, presents conclusions and recommendations based on the results of the data-gathering and analysis phases of the assessment. This document synthesises and analyses the information that was presented in the first three reports to DG Internal Market and Services (MARKT), and takes into account comments and guidance provided by the evaluation Steering Group.

1.2 THE OBJECTIVES OF THE EVALUATION

The objective of the assessment was to undertake an evaluation of the achievements and potential of Citizens Signpost Service. In particular, the study examined the effectiveness, relevance and sustainability, coherence and strategy, and efficiency of the service to make conclusions and identify recommendations, which could be taken into account in the future management and operation of the Citizens Signpost Service.

1. Effectiveness

- Achievement of CSS objectives
- Compliance with quality criteria as set out in the contract between the contractor and DG MARKT and further developments.

2. Relevance and Sustainability

- Relevance of CSS objectives to the needs of citizens and the European Commission.

3. Coherence and Synergy

- Complementarity to other interventions having similar objectives; added value to other services of the European Commission; contribution to synergies between tools set up at EU, national and regional level.

4. Efficiency

- Achievement of CSS objectives at a reasonable cost in terms of financial and human resources deployed taking account, as appropriate, of any differences between new and former Member States.

1.3 THE CONTEXT OF THE CITIZENS' SIGNPOST SERVICE

For the Internal Market to deliver its full potential, it is not enough to put a legal framework in place and to enforce the rules. Citizens need to understand how the law and administrative practice affect them. They need to know their rights and how, in concrete terms, they can exercise them: a citizen who is not aware of his/her rights and opportunities in the Internal Market, will never use them. Practical information, advice and problem-solving, therefore, also contribute to a better functioning of the Internal Market in its widest sense. Consequently, for the last ten years, the Internal Market and Services Directorate General has been developing several initiatives to give practical information and advice to citizens and business (the former "Dialogue with Citizens which has now been integrated in "Your Europe" and "Citizens Signpost Service") and to resolve their Internal Market problems ("SOLVIT", "FIN-NET").

1.4 THE DEVELOPMENT OF THE SERVICE (CSS) FROM 1996 TO DATE

The Citizens Signpost Service (CSS) was first launched in 1996 and constituted one of the main components of the information campaign "CITIZEN FIRST" aimed at raising citizens' awareness of their rights in the single market and helping them to exercise these rights in practice. Run as a pilot project from 1996 to 1998, "CITIZENS FIRST" laid the foundations for the Commission's decision to continue on a permanent basis with "Dialogue with Citizens and Business" initiative as part of the "EUROPE DIRECT" service launched at the European Council in Cardiff in June 1998. The overall objective of these initiatives was:

- to make people more aware of their rights within the European Union and its Single Market;
- to establish two-way communication with citizens in order to obtain feedback about the problems they have in exercising their rights.

Following an open tender procedure, in July 2002 the European Commission awarded a service contract of maximum five years to the European Citizen Action Service (ECAS) to operate the CSS for 15 Member States in 11 official languages. In 2004 the European Commission extended the CSS to 10 new Member States following a negotiated procedure with the contractor of the Service. The Service is now provided to 25 Member States in 20 official languages.

With the launch in mid-February 2005 of Your Europe portal (a joint initiative of Enterprise Directorate General, Internal Market and Service Directorate General and Press and Communication Directorate General) the CSS is presented in a new context. The CSS is part of a "cascade" of services (EUROPE DIRECT, YOUR EUROPE, SOLVIT, FIN-NET, IPM) for citizens and businesses which aims to offer information, advice and problem-solving services related to cross-border activities and access to e-services. The citizen part of this portal provides

citizens with detailed practical information on their rights and opportunities in the European Union, for its citizens. For example, there is information on living and working in another EU country, on social-security issues, recognition of qualifications, consumer protection, and gives access to Citizens Signpost Service.

1.5 THE RATIONALE FOR THE EVALUATION

As mentioned earlier, the Citizens Signpost Service is managed via a contract with an external service provider, ECAS. The current contract commenced in July 2002 and is likely to have a duration of a maximum of 5 years. Almost three years into this contract and following enlargement of the target clientele of the service from the EU 15 Member States to the current 25 Member States, the Directorate General for Internal Market has decided to conduct an evaluation of the service. As it starts to plot the future development of the service, DG MARKT requires an in-depth analysis of the achievements and potential of the Citizens Signpost Service.

DG MARKT has identified the need to provide a service, which addresses the requirements of the general public. This evaluation intends to assess whether this need is currently being met. This will require consideration of the changing content and format of information to be provided, and of the needs and priorities of European citizens as perceived by clients of the service and those responsible for coordinating the information and communication effort. The assessment will also require consideration as to whether the Service adds value to other sources of information and to what extent it complements and contributes to synergies between tools set up at EU and/or national and regional levels. It is anticipated that the outcome of the evaluation will enable DG MARKT to adapt its tool if and when required to improve its relevance and effectiveness to better serve its public.

2. THE METHODOLOGICAL APPROACH

2.1 OVERVIEW

The evaluation of the Citizens Signpost Service was guided by an intra-DG Steering Group, which included members of the DG Internal Market and Services CSS team and representatives from other Directorates General of the European Commission that are also involved in the provision of information and advice services.

The work programme and methodology used during the evaluation of the Citizens Signpost Service comprised 4 work phases and each phase was captured in a report to the Commission:

- PHASE 1: Start Up and Contextual Analysis
- PHASE 2: Citizen Signpost Service (CSS) In Focus & Interim Reporting
- PHASE 3: Mystery Caller Survey, User Satisfaction Survey Programmes
- PHASE 4: Final Reporting

Key data gathering and analytical tools included desk research and descriptive analysis, in-depth structured interviewed interviews, an on-line survey of existing and new users, and a mystery test calls and e-mail programme.

2.2 PHASE 1: START UP AND CONTEXTUAL ANALYSIS

The first phase of the evaluation was launched by a start-up meeting with the evaluation steering group on 22nd July 2006, which provided the opportunity for the Commission to describe the background, context and expectations of the evaluation. Meanwhile, the evaluation team was able to present the proposed approach, to understand any limitations or constraints in terms of available data and historical perspectives.

The main thrust of the first phase of the evaluation was an in-depth analysis of background information and statistics regarding the running of the service. The purpose of this exercise was to allow the evaluators to fully understand how the service had developed and operated over time from the perspective of users, providers and managers of the service both within DG MARKT and the contractor ECAS. The desk research considered the following documentation, which was reviewed and analysed and used to identify issues for discussion with the DG Internal Market team.

Information reviewed by TEP

Political Background

1. Conclusions of the European Council at Cardiff on 14.06.1998.
2. Single Market Action Plan endorsed by the Amsterdam European Council in 1997
3. External Communication Strategy of Internal Market and Services Directorate General

Contractual Obligations

4. PRS/2004/IM/A3/41 (running contract) plus annexes
5. PRS/2003/B5-3001/A/80 – Extension of the contract to 10 Member States
6. Recent ECAS monthly reports and internal analysis
7. Citizens Signpost Service/Human and budgetary resources – Summary table

Running the Service

8. Recent Minutes of Citizens Signpost Service Steering Committee and Working Groups
9. Citizens Signpost Service Annual Report (years 2003 and 2004)
10. Last statistics (recorded and replied enquiries, delay verification and encoding into IPM during 2004 and January to April 2005)
11. Citizens Signpost Service Leaflet/General information

Information from the CSS Database

12. All eligible enquiries (2002 – 2003, 2003 – 2004, 2004 – 2005).
13. Aggregated statistics including related to quality control, delays and hits and visits to the web site.

In-depth interviews with the DG Internal Market and Services CSS management team took place during August 2005. The meetings aimed to:

- obtain detailed background information on the Citizens Signpost Service, including the evolution of the service, quality assurance procedures, CSS database infrastructure, CSS resources, and CSS awareness and promotion.
- better understand the relationship and the modus operandi between DG MARKT and the Citizens Signpost Service Contractor – ECAS.
- better understand the links between the Citizens Signpost Service activities and the goals of DG MARKT.
- discuss the perceived strengths, weaknesses, opportunities and threats to the service within the context of the cascade of Commission services (E.g. Europe Direct, SOLVIT etc.) from the perspective of DG MARKT.

Each member of the DG MARKT CSS team (indicated below) was interviewed by the evaluation team and results of the first phase led to the development of an Inception Report providing an initial Descriptive Analysis of the Citizens Signpost Service based on institutional memory and documentary evidence. The report drew a number of initial conclusions, which were discussed with the evaluation Steering Group.

DG MARKT CSS TEAM	ROLES AND RESPONSIBILITIES
AD	Head of Unit, Internal and External Communication (responsible for CSS)
MGB	CSS Coordinator and main point of contact for ECAS, Quality Assurance
LD	CSS database, Statistics, IT aspects
LJ	Statistical analysis, Promotional aspects
ST	Contractual aspects
AM ⁸	Quality Assurance

2.3 PHASE 2: CSS IN FOCUS AND INTERIM REPORTING

The second phase of the assignment commenced with in-depth structured interviews with key members of the ECAS Management Team (including managers who also work as CSS experts). The purpose of discussions with ECAS was to test TEP's conclusions from analysis of background data and interviews with unit A.4 of DG Internal Market and Services. In addition, TEP tried to find out more about the day-to-day running of the service, including handling and answering enquiries to citizens, managing CSS experts, and reporting and coordination with the DG Internal Market and Services team.

Next, a sample of other Commission and Member State information and advice services was selected and interviews were carried out to review the degree of complementarity between the CSS and the services and the added value provided by CSS. A face-to-face or telephone interview was undertaken with a representative from each service. These inputs were supplemented with information available on the Internet. The services reviewed were:

General Information Service
EUROPE DIRECT

Specific Information and Advice Service
Eurojus

Problem-solving Services
SOLVIT
FIN-NET

Specialised Networks to targeted audiences
EURES (workers)
European Researcher Centres (researchers)
ECC-NET (consumers)
European Judicial Network in Civil and Commercial Matters (those responsible for the judiciary and legal practitioners)

Other

⁸ It should be noted that Alexandre Massoutier left the Commission at the end of September. Alexandre's tasks on quality assurance were taken over by Carl-Erik Nordh.

Interactive Policy Making (IPM)⁹

This phase of the evaluation provided an opportunity to review:

- good practice in the organisation of information and advice provision;
- the costs and processes involved in providing advice;
- views and perceptions of CSS as seen from inside and outside the Commission;
- existing and potential synergies between CSS and other services;
- strategic options of mutual benefit.

In addition, to the review of Commission services, three national advice services were taken into account: Comhairle (Ireland), the Citizens Advice Bureau (UK), and the Citizens Advice Bureau (Poland). These countries were selected following efforts to identify national citizens advice organizations including e-mails to expatriate web sites highlighted that most EU countries do not currently provide a centralized citizens advice service. One aspect of this part of the assessment was to attempt to identify the size and needs of potential users of the Citizens Signpost Service in the Member States. DG Internal Market and Services provided statistics from Eurostat on the numbers of workers and unemployed citizens living in a Member State other than their Member State of origin. However, this data and interviews with representatives of national services did not service to give an in-depth view on potential users. The findings from this phase were presented in a second report to DG Internal Market and Services.

2.4 PHASE 3: MYSTERY AND USER SATISFACTION SURVEYS

TEP carried out a test calling and emailing plan to measure the quality of the telephone/email service facility offered by Citizens Signpost Service. Enquiries were made by callers/e-mailers representing 11¹⁰ official EU languages, and 10¹¹ telephone calls and 60¹² email enquiries were carried out. The number of enquiries per language was weighted to represent the equivalent proportion of enquiries received by the CSS in that language. DG Internal Market and Services produced 'benchmark' questions and answers, which were used to test the CSS

⁹ No interview was held to discuss IPM because IPM had been the subject of a recent evaluation by TEP.

¹⁰ The languages options for the survey were as follows:

EU-15 Member States: English, French, German, Spanish, Italian, Swedish

EU-10 Member States: Polish, Hungarian, Czech, Lithuanian, Slovakian

¹¹ 10 mystery telephone enquiries represented circa 8% of *eligible* phone enquiries over a three month period based on "replied" enquiry figures for 2005 (average figures from January to April 2005).

Source of CCS Telephone Enquiry Figures: *CSS Statistics 2005*

¹² 60 mystery email enquiries represented circa 6% of *eligible* email enquiries over a three month period based on "replied" enquiry figures for 2005 (average figures from January to April 2005).

Source of CCS Email Enquiry Figures: *CSS Statistics 2005*

service and evaluate the quality of the responses provided. The Mystery Survey focused on indicators on the following aspects of the CSS service:

- Relevance/“Content” quality of the answers (Answer respects quality criteria established in contract/Usefulness of the answer)
- Ease of access to the service
- Response time
- Language skills of CSS experts (Answer in language requested)
- Politeness and manner of handling enquiries (Flexibility of experts/patience)

In addition to testing the CSS service, an on-line survey was set up and promoted to new and previous clients (circa 400) to find out about their level of satisfaction with the service provided. The survey provided a key mechanism to test issues of effectiveness, relevance and sustainability and coherence and synergy and also focused on the following:

- How users became aware of the service
- Accessibility of the service (ease of use, waiting time, etc.)
- Response time
- Relevance of the replies provided
- Usefulness of the service
- Linguistic skills of the CSS experts
- Frequency of use (first time user/several experiences)
- CSS effect on perceptions of the EU
- Suggestions for how to enhance and improve the service
- Benefits of different communications channels and preference for CSS as opposed to national/local services.

The online survey was made available in 8¹³ official Community languages. The survey comprised a majority of closed questions to allow respondents to complete the questionnaire quickly and to facilitate the analysis of data. In addition, the survey included several open questions to allow clients of the service to provide direct feedback to the Commission on the Citizens Signpost Service.

2.5 PHASE 4: FINAL REPORTING

The final phase of the assignment brought together analysis from the earlier three phases, triangulated the findings and allowed the evaluation team to

¹³ The languages options presently proposed for the user satisfaction survey were as follows:
 EU-15 Member States: English, French, German, Spanish, Italian, Swedish
 EU-10 Member States: Polish, Hungarian, Czech

identify conclusions and recommendations to the Commission for the future development of the Citizens Signpost Service. The outcome of this process was the production of a Draft Final Report, and a Final Report (this document).

3. SUMMARY ANALYSIS OF THE CITIZENS SIGNPOST SERVICE

3.1 OVERVIEW

The Citizens Signpost Service (CSS) is one of the Commission's information and advice services, which is provided free of charge to the EU general public. The service can be accessed by Europe Direct's telephone or e-mail service or via the CSS web site. CSS is available to provide advice related to all 25 Member States in 20 Community languages. This level of coverage is fully appropriate to a service that is aimed at a generalist population who cannot be expected to speak another Community language. There are a number of other Commission services that do not provide this level of linguistic and country coverage.

DG Internal Market has outsourced the day-to-day running of the CSS to a contractor (ECAS). ECAS coordinates a team of circa 55 part-time freelance legal experts, who provide initial legal advice and signposting to citizens. CSS does not aim to solve citizens' problems; it seeks to clarify EU law on the issue and to indicate sources of help to citizens.

The Citizens Signpost Service is underpinned by a database, which currently holds details of more than 20,000 enquiries and responses provided by experts, as well as translations of information when interactions are in languages other than English and French. The database allows each individual enquiry to be tracked according to the profile of the sender, the method or request and response required, the complete timeline from start to finish of handling the enquiry and the response provided. The database provides a common structure to the interactions between the Commission, the contractor, the legal experts and citizens. The database is a highly effective tool, which allows DG MARKT full visibility of the current work of the service, as well as a detailed, accurate historical record of performance. The database is an extremely valuable resource and strength of the service. There are few other citizens advice services either inside or outside the Commission, which are able to generate such detailed management information about the on-going performance and development of the service.

With regards to future expansion of the service DG Internal Market and Services is in an optimal position:

- Managers have detailed knowledge of the history and development of the service;
- The operation is in mature state and no major amendments are required to information processes;
- Operational tools have been developed to a high standard;

- A high-quality service is being delivered according to deadlines and standards set for the service;
- The service provided is considered to be valuable both by clients of the service and those responsible for other similar services.

This is fertile ground to tackle the two main obstacles to further development of the service: low awareness of CSS; lack of take up of Internal Market policy insights.

3.2 THE SERVICE TO THE CITIZEN

3.2.1 ACCESSING THE SERVICE

The Citizens Signpost Service can be accessed via telephone, e-mail and on-line. Enquiries entering the service via telephone and e-mail are forwarded to the service by Europe Direct, the Commission's free general information service. Europe Direct provides a single telephone number for all enquiries to the Commission, which represents a logical access point for all telephone enquiries to CSS and an efficiency gain for the service. Significant additional efforts would be required to try to promote a CSS dedicated telephone number, with no guarantee of success.

The majority of enquiries to the CSS (circa 78%) are made by e-mail/on-line. Between July 2002 and September 2005 the ratio of e-mail/on-line enquires to telephone enquiries was circa 8:1. The results of the evaluation mystery survey suggest that Europe Direct operators are answering some telephone enquiries that could be transferred to CSS; 9 out of 10 mystery calls were answered by Europe Direct. While this is likely to influence the number of telephone enquiries received, the fact that Europe Direct operators are answering these types of enquiries should not necessarily be viewed negatively. It reflects the evolution of the Europe Direct service, where operators become more and more used to the types of questions posed by the public and make their best efforts to provide a service, which is to be commended. (This point is discussed in more detail when reviewing the complementarity of services.) However, the desirability of access via e-mail/on-line was confirmed by citizens who answered the on-line survey: 70% of respondents said they preferred to make an enquiry on-line, 23% had no preference and only just over 6% preferred to make contact by telephone. However, those who responded to the on-line survey had used this mechanism previously to access the service.

Providing access to advice via e-mail and telephone provides flexibility to citizens. In some cases, telephone access may not be appropriate to the type of enquiry, while in others it allows citizens to feel that they have a direct contact, even if this contact is with Europe Direct. Consideration of similar services at the national level highlights that the provision of advice via different access mechanisms is standard. These services go further than CSS by allowing face-

to-face meetings, but there is some distinction made as to when a face-to-face meeting is required. Meetings are used for urgent and critical matters that require immediate attention and where some of counselling is required in addition to the provision of assistance. This need goes beyond the scope of CSS, which does not intend to help citizens to solve their problem, but to inform who can help to solve the problem. Face-to-face meetings are provided by a similar Commission service Eurojus, which is provided by legal experts located in 11 EU Representations in the Member States. CSS experts offer the opportunity for a face-to-face consultation with a Eurojus expert, in cases where this is relevant.

There is a need to increase the number of entry points where citizens may access the Service. There is currently a link from the SOLVIT web site. However, despite CSS relevance to other Directorates General, such as DG Employment, DG Enterprise and DG Education and Culture, their web sites and services such as EURES and the European Youth Portal do not link to Your Europe or the Citizens Signpost Service and therefore do not facilitate access to CSS. Increasing the number of links from other web sites to CSS requires the collaboration of other internal and external services. As CSS is a horizontal advice service, it covers different target groups. As thus, it is understandable that other services have not yet linked to CSS, because they probably do not want to confuse their target groups. Furthermore, there may be a lack of understanding that collaboration with CSS can be mutually beneficial. (There is further discussion on this point under the section on the complementarity of other services.)

When Your Europe or CSS is advertised on other Commission websites, a clear description of the type of service on offer is required so that users do not lose time trying to understand what CSS can offer or, at worst, do not attempt to understand this. Descriptions of services¹⁴ given on Your Europe are relatively clear and succinct and could be provided to other services for their sites. Responses to the on-line survey back up this point. Nearly 25% of respondents disagreed or disagreed strongly with the statement that CSS was easy to access another 24.4% were neutral on this point. If those who have used the service find the service difficult to access then there is little hope for those who do not know about the service to come across it by accident. The need to raise awareness of CSS is addressed in the section on Strategic and Operational Management of the Service.

From an operational point of view, the provision of access via telephone, e-mail and on-line, works efficiently. All enquiries are entered into the central database without delay and provided with a unique reference number. Enquiries are then handled in a standardised manner with initial consideration by ECAS, which allocates enquiries to experts. Europe Direct plays an important role in the

¹⁴ See simple descriptions provided at:
<http://europa.eu.int/youreurope/nav/en/citizens/services/index.html>

provision of access. On average 30 – 35% of enquiries¹⁵ (e-mail and telephone) are diverted via Europe Direct. Europe Direct operators enhance the service by filtering out-of-scope questions, recording the enquiry in a way that makes comprehension of the enquiry easier to understand and providing a single free telephone number, which makes it easy for users. There is obvious synergy between the services provided by Europe Direct and CSS and this is a good example of intra-DG cooperation. However, the lack of visibility of CSS on the Europe Direct web site needs to be addressed. There is a link to CSS on the Europe Direct web site, but the services provided by CSS needs to be fully described.

Those who decide to access the service via the on-line enquiry form (the majority of users) find a form that is clearly presented. The form leaves little room for ambiguity in terms of what citizens need to do to request advice from CSS. There are no major changes required to the on-line form in order to improve access. However, there are a number of small changes that could:

enhance citizens' understanding, such as :

- providing examples of eligible and ineligible enquiries;
- providing definitions of residence.

enhance experts' work, such as:

- standardising the encoding of telephone numbers;
- including advice on how to formulate an enquiry elsewhere on the site.

enhance the efficiency of the service, such as:

- adding a second e-mail address field to reduce e-mail address error;
- indicating the time zone for response times.

enhance the usefulness of data gathered, such as:

- making profile information compulsory.

3.2.2 THE NATURE OF ENQUIRIES

Analysis of the types of enquiries¹⁶ received by the CSS indicates that the typical profile of a CSS user is an employed citizen from one of the EU-15 Member States, aged 25-44¹⁷, who has difficulties in relation to working in another EU

¹⁵ According to statistics provided by DG MARKT relating to January 2004 – August 2005

¹⁶ This information is based on statistics on use of the service between July 2002 and September 2005.

¹⁷ Analysis of data per country highlights that for each Member State the highest group of enquiries falls between the age of 25 – 44, followed by the age group 45 – 64. The number of enquiries from the under 18's is so few that there is little point in targeting this group in anyway.

Member State. The interest for those who are working or seeking employment is also confirmed by the low percentage of enquiries (2%) by homemakers/those not employed and not seeking employment.

Regarding the country of residence of those making enquiries, in 2005 a high number of enquiries was received from Poland (412). Polish residents submitted the 4th highest number of enquiries after Germany, France and the UK, which all submitted circa 650 enquiries.

Analysis of the types of enquiries received and the economic activity of enquirers confirms that significant numbers of users of the service can be signposted to other Commission services and that there is likely to be scope for other Commission information services to interact with CSS, as highlighted below:

- 10% of enquiries were from students and researchers and circa 9% of enquiries related to studying, training and doing research in another country. This confirms the need for close links with the Commission's Researcher Mobility Centres, which is soon to be realised through a link to the CSS database.
- 11% of enquiries were from unemployed/job seekers, which confirms the potential for closer links with EURES set up by DG Employment and Social Affairs to promote job mobility in Europe.
- 8% of enquiries related to the purchase of goods and services in the Single Market, which highlight the potential for links to the network of European Consumer Centres ECC-NET.

TOPICS AND ECONOMIC CATEGORIES OF CITIZENS	BUYING GOODS & SERVICES IN SINGLE MARKET	DATA PROTECTION IN THE EU	ENFORCE RIGHTS IN THE SINGLE MARKET	EQUAL RIGHTS FOR MEN AND WOMEN	LIVING IN ANOTHER EU MS	STUDY, TRAINING & RESEARCH IN ANOTHER EU MS	TRAVEL IN ANOTHER EU MS	WORKING IN ANOTHER EU MS	OTHER	TOTAL	%
Employed	676	7	467	17	1819	461	551	3522	70	7520	43%
Homemaker, not seeking employment	22	1	21	1	172	13	35	160	3	425	2%
Not available	8		10		36	6	8	52	3	120	1%
Other	247	4	240	5	861	214	235	1226	26	3032	17%
Retired	88	1	76	2	463	8	62	377	9	1077	6%
Self employed	185	4	130	1	401	148	125	819	20	1813	10%
Student, trainee, Researcher, etc	101		76	2	298	525	85	637	14	1724	10%
Unemployed, Jobseeker	28		79		351	157	27	1281	7	1923	11%
Total	1355	17	1099	28	4401	1532	1128	8074	152	17786	
Percent	8%	0%	6%	0%	25%	9%	6%	46%	1%		

More enquiries are made to CSS by men than by women (at the rate of 60% men and 40% women) and this trend is the same for every European Member State and every nationality. The higher rate of usage by men than women is likely to reflect the fact that 43% of enquiries relate to a problem due to working in another EU Member State and that EU employment rates are higher for men than for women.

Citizens are not required to classify the subject of their enquiry as this is done by the CSS experts. The level of classification is broad in comparison to the classification of fact sheets on Your Europe and in comparison to classification systems used by other information services of the Commission for example ECC-NET or SOLVIT. More refined classification would allow greater targeting of the service, although this would require changes to the CSS database.

Between July 2002 and December 2005, 23,652 enquiries were received by the service.

ENQUIRIES RECEIVED BY CSS			
Contractual Year	CSS web form	Europe Direct	Total
2002 - 2003	7419	94	7513
2003 - 2004	4968	1907	6875
2004 - 2005	4548	2237	6785
2005 - 2006 (*)	1552	927	2479
Overall totals	18487	5165	23,652

* This includes the contractual period up to December 2005

During this period, there was a slight decrease in the number of enquiries. There are several reasons for the lack of growth of use of the service, these mainly include:

- **Low internal awareness** of the service within the Commission and insufficient signposting to and descriptions of CSS on other Commission web sites, even those services that are interlinked such as Europe Direct (the ear-piece of CSS links to but does not fully present CSS on its web site);
- **Low external awareness** of the service by citizens and citizens advice services in the Member States, including lack of integrated promotion or presentation on relevant web sites.

In addition, a number of other factors are likely to impact negatively on usage:

- The volume of **other information** available to citizens on EUROPA, for example the Your Europe fact sheets and the difficulties in navigating around the EUROPA web site;
- The **ability of Europe Direct operators** to handle enquiries to CSS themselves (this should not be viewed negatively as it may be more efficient for citizens in some cases – however unlike CSS experts Europe Direct operators are not legal experts and are asked to inform rather than provide advice);
- The **difficulty in distinguishing** between the CSS and the range of other services available limits promotion of the service. The name of the service is a key weak point and options for a common message or brand could be considered to facilitate presentation to citizens (*Citizens Advice and Signpost Service* would be more meaningful).

The contract for the provision of CSS provides a flat rate fee for the provision of the service to 25 Member States in 20 languages for the first 6,000 eligible and unlimited ineligible enquiries. Over the last 3 years the number of eligible enquiries received per contractual year has been considerably less than 6,000. In 2005, 4432 eligible enquiries and 1255 ineligible enquiries were received by the CSS. Given the consistency of the volume eligible enquiries during the period under consideration it would seem that unless structural changes are made to the scope of the service or its ability to penetrate into target audiences in the EU Member States, the volume of enquiries is unlikely to vary significantly in the next few years. This is confirmed by the, as yet, relatively low uptake of the CSS by citizens from the New Member States.

From May 2004, the contract for provision of services was extended to allow for a maximum of 1,000 additional eligible enquiries from citizens in the EU-10; this did not necessarily indicate the expected enquiry rate from these countries, but allowed the contractor to develop the service so that it could answer questions in 20 languages covering 25 Member States. From 2003, the overall number of enquiries from the EU-10 Member States represents circa 7.5% of all enquiries. It should be noted that the proportion of enquiries from EU-10 Member States appears to be increasing.

NUMBER OF ELIGIBLE ENQUIRIES BY COUNTRY OF RESIDENCE BY CONTRACTUAL YEAR		
Year	EU-15	EU-10 (% of total)
2002 - 2003	2870	0
2003 - 2004	4148	117 (2.8%)
2004 - 2005	4057	557 (12%)
2005 - 2006 ¹⁸	1643	310 (15.8)

¹⁸ Statistics for contractual year 2005 – 2006 relate to the period July - December 2005.

As highlighted above, unless significant changes are made to way that the service is targeted, for example to increase the scope of eligible enquiries, it seems difficult to justify the fixed fee paid to the contractor for the first 6,000 enquiries. Given that, since its inception, the service has not answered more than 5,000 eligible enquiries per annum, there is a strong suggestion that the threshold should be lowered.

3.2.3 RECEPTION OF ENQUIRIES

Each enquiry to the service is entered immediately into the CSS database either by the citizen's use of the on-line form, or by a Europe Direct agent who has processed a telephone call, or forwarded an e-mail or web form enquiry to the service. The immediate encoding of enquiries ensures accurate reporting. Developments underway to allow other Commission services to also encode enquiries into the CSS database via database links to SOLVIT and ERA-MORE, will provide a facility to further expand the scope of the service and provide a good example of the benefits of synergies between different advice services and DGs.

The fact that each enquiry is automatically allocated with a unique reference number is good practice. The process allows the monitoring of a timeline for each enquiry, thus those responsible for the service are able to monitor the length of time spent answering each enquiry. In comparing CSS with other similar Commission services it can be noted that, many other services do not have a central database, managed by the Commission and therefore do not have the same high level of control over inputs to and outputs from their service.

All incoming enquiries are encoded into the CSS database either by citizens via the on-line form, or via a Europe Direct agent. The eligibility of each enquiry is assessed by ECAS and, if eligible, the enquiry is allocated to an expert. (Citizens who make an enquiry, which is considered to be outside the scope of the service receive an automated reply, which is generated by the CSS database.) The process for the reception of enquiries has the added benefit of allowing the contractor to have a view of all enquiries entering the service. The transfer of enquiries to experts is perceived to be efficient by the experts allow the contractor requests an additional comments field in the database to provide structure to the provision of comments when distributing enquiries (this field will be included in the next update to the database). The service has specific eligibility requirements, for example the need for enquiries to be from citizens not businesses and to relate to actual problems rather than theoretical issues.

Between July 2002 and December 2005, the total number of eligible enquiries was 15,223 and the total number of ineligible enquiries was 6381, see below.

REPLIED ENQUIRIES FROM 01/07/2002 TO 31/12/2005					
	Duplicate	Eligible	Incomplete	Ineligible	Total
e-mail	864	13369	892	5915	21070
phone	122	1854	109	472	2557
Total	986	15223	1001	6387	23627¹⁹

The main reason for ineligibility in over 70% of cases is that the enquiry is not relevant to the Internal Market, it appears that Europe Direct operators play an important role in filtering enquiries that are passed to the Citizens Signpost Service. However, TEP's survey suggests that the operators appear to be able to deal with some of the telephone enquiries that could be passed on to CSS experts. The formal filtering of eligibility of enquiries is carried out by ECAS prior to passing enquiries to experts. This process allows a high level of control over the process, ensuring that efficient use of experts' time is maximised and focuses on eligible enquiries.

The high number of ineligible enquiries does not affect the efficiency of the service, although some management time is lost dealing with this issue. However, from a user's point of view it can be frustrating and appear very bureaucratic to receive a response which states that an enquiry cannot be handled due to ineligibility. Thus the current system is not particularly user-friendly, especially so for telephone enquiries that are judged to be ineligible as citizens are not even aware that the service is limited in scope and are forwarded on to CSS in good faith. A service that is targeted at the general public needs a greater degree of flexibility. The appropriateness of classing enquiries as ineligible can be questioned, particularly given the reality of an EU, where citizens are critical of the added value of the EU, highlighted by referenda in The Netherlands and France in 2005. Also, it is recognised by those responsible for communicating about the EU Institutions to the public that there is low public awareness and understanding of the real benefits of membership of the European Union. That circa 55% of respondents to the user satisfaction survey agreed or agreed strongly that the service had improved their perception of the European Commission, suggests that CSS has a role to play in communicating the EU to citizens.

The main reasons for ineligibility are indicated in the below table.

¹⁹ At the time of reporting, the number replies sent to enquiries was slightly lower than the number of enquiries received during the same period, as responses were still being prepared to some enquiries.

STATISTICS ON INELIGIBLE ENQUIRIES FOR THE PERIOD 27/04/2005 TO 30/12/2005*		
Ineligibility criteria	Duplicate	Ineligible
Enquiry already answered	43	
From a consultancy or legal firm		9
No significant new information	11	
Not from a European citizen		28
Not relate to a real situation		32
Not relate to Internal Market rights		424
Not specific		68
Working on the previous answer	45	
Total	99	561

*No data available before 27/04/2005 as this functionality was introduced only within maintenance bundle 2 (2005).

There is a clear logic as to why enquiries that relate to a theoretical situation are considered to be outside the scope of CSS; those responsible for the service want to focus expertise on the provision of practical advice rather than for purely academic purposes. It is reasonable that citizens may prefer to check their legal rights before taking action. However, the main reason for ineligibility is that citizens do not understand which legislation is covered by the Internal Market, see the below table. This is quite understandable, given that many citizens are unfamiliar with the term Internal Market, or the boundaries of the jurisdiction of the DG that deals with it. For these enquiries, the service could focus on more targeted signposting²⁰ rather than providing an interpretation of the legislation and, as highlighted earlier, efforts could be made to provide examples of the types of areas that fall under national jurisdiction for example.

With regards to improving the responsiveness of the service to users' needs, two options are suggested:

- **Option 1: Improve the clarity of the scope of the service to users:** there are several ways that the scope of the service could be better explained, for instance via the provision of:
 - detailed explanation on the Europe Direct web site;
 - examples of typical eligible and non eligible enquiries on the CSS website;
 - a scroll-down list of the areas of jurisdiction covered by EU and national legislation. (This approach is taken by SOLVIT.)

²⁰ Standard responses to non-eligible enquiries already include an element of signposting as citizens are pointed towards the Your Europe web site, for example.

- **Option 2: Increase the scope of the service:** national Citizens Advice Services are more user-friendly than CSS because they take an ‘accept all enquiries’ approach. In the Member States, citizens advice services (where these exist) provide different levels of assistance and advice according to the type²¹ of enquiry made. Meanwhile, as highlighted above, CSS has strict rules on eligibility, and 27% of all enquiries have been judged to be ineligible over the course of the service²².

TEP suggests that CSS should follow the inclusive type of approach taken by the Member States services and accept all EU citizens’ enquiries. Where enquiries fall outside the scope of Internal Market and Services, CSS experts may need to provide a simple signposting service without legal advice. Enquiries regarding the application of Internal Market legislation would continue to receive signposting and legal advice. CSS would retain its overall objective and description of services, but not disqualify enquiries from citizens that do not match the eligibility criteria. This approach would allow CSS to:

- meet the wider needs of citizens (those with more theoretical questions);
- the flexibility required to link to national advice services, which have established networks into the Member States, thus increasing penetration of CSS in the MS;
- increase the number of enquiries received due to the broader scope of enquiries permitted. This would clearly increase the workload of the CSS experts, but would be much more user-friendly.

3.2.4 ANSWERING ENQUIRIES

Each eligible enquiry is allocated to one expert even though most questions relate to two countries. There is some evidence to suggest that if there was more interaction between experts (for example more than 1 training meeting per year) there would be a greater tendency for experts to check the corresponding situation in other Member States with each other. The allocation to a single expert can be considered to be appropriate and efficient given that quality assurance controls and feedback from experts suggests that one expert is usually able to answer each cross-border enquiry. Management of the query allocation process will be enhanced by a planned change to the on-line enquiry form requiring citizens to indicate the Member State to which their enquiry most relates.

²¹ For example face-to-face meetings are usually arranged for urgent situations, for example those place citizens at risk, telephone advice is considered to be more appropriate for advice and e-mail for information requests.

²² This percentage relates to enquiries received between July 2002 and December 2005.

Experts are limited in their ability to provide high-quality answers by the level of detail provided by citizens. Europe Direct operators help here by trying to get as much information as possible from citizens who call the service. CSS experts who are required to give a response to citizens by telephone also have the option to dig a bit deeper into the requirements and context of the citizen. For this reason, some experts prefer to call citizens back. The CSS operates on the basis of one reply per question. However, there is merit in the contractor's suggestion to develop a 'stop the clock' mechanism in the database²³, to allow experts to ask citizens for further clarification before they provide a response to a very complex case. Although modifications would be required to the application of response deadlines in the database, this adjustment would enhance the current service provided.

The CSS is flexible to the needs of citizens' who are able to decide how they prefer to receive a response: by telephone or e-mail. Experts may also point citizens to the possibility of a face-to-face meeting with a Eurojus expert, if this is relevant. CSS experts also point citizens to other Commission services such as SOLVIT, ERA-MORE, and EURES and this offers potentially a high degree of synergy between different Commission services, although it appears that lack of awareness of CSS by these services limits their ability to take full advantage of the valuable service available. Those interviewed who are responsible for citizens advice services at the national level indicated that CSS is a valuable service and this view is reflected by over 76% of respondents to the on-line user satisfaction survey, who indicated that the service is very important.

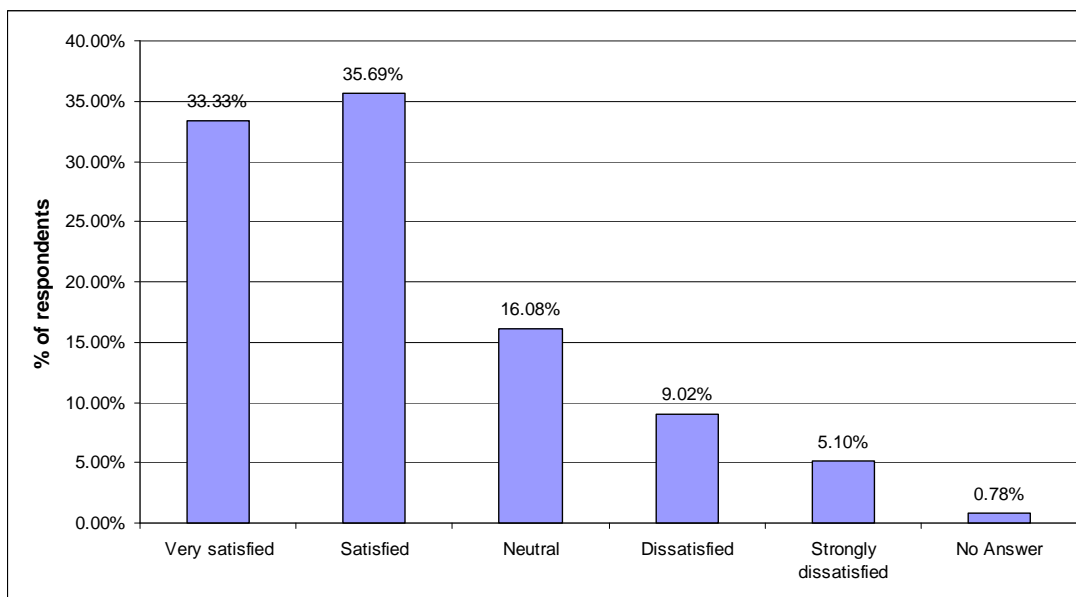
Citizens receive a response to their enquiry within at least 8 days, although they often receive a response before, because experts are required to provide a response within 3 working days. The amount of time allowed for responses is appropriate and arrangements for deadlines for response should be retained. The deadlines are workable for the CSS experts and the contractor, they provide DG Internal Market and Services with assurance that enquiries will be answered within a relatively short time frame, and provide a high level of service to citizens. Comparison with the other Commission citizens' services included in the study and the three national citizens services shows that, in most cases, other services (with the exception of Europe Direct) can not and do not guarantee a deadline for answering responses. Whilst deadlines have been prescribed as part of the contract for the provision of CSS services, there is some flexibility in the approach, which is necessary because in a minority of cases (circa 10%) it is not feasible to answer an enquiry within 3 days, due to the complexity of the enquiry. Nevertheless, the process followed is controlled as citizens are informed that further time is required, and the experts are required to indicate the reason for lateness in the database.

²³ Whilst there is a standard reply used for incomplete questions this comment refers to those enquiries which present a complete question, but where greater contextual knowledge would significantly enhance the expert's ability to provide a high-quality answer.

With regards to the content of responses provided to citizens, the contract between DG Internal Market and Services and ECAS requires that responses provide:

- *precise information and personalised guidance as regards the exercise of Internal Market rights in practice, in response to eligible enquiries;*
- *practical advice and signposting towards appropriate local, national or European authorities/bodies capable of resolving difficulties and providing means of redress both at EU and national level where difficulties have been encountered in the exercise of Internal Market rights.*

The results of the mystery survey carried out to test how CSS experts deal with telephone and email enquiries shows that when enquiries are passed on to the experts, they consistently meet the above criteria. The results of the online survey confirm that the content of responses is meeting users' needs. The majority of respondents were either very satisfied (33%) or satisfied (36%) with the answers they received from the Service, as highlighted in the below graph. There was little difference between the views of respondents from the EU-10 and EU-15 Member States.



While the majority of respondents to the survey are likely to be either more positive or more negative than the average, this result can be considered to be indicative of the service being provided by CSS. Other results from the satisfaction survey suggest that satisfaction rates are linked to the fact that CSS provides 'free' expert legal advice, which is appreciated by citizens. Respondents were particularly positive that advice from CSS would be difficult to find elsewhere; 72% of respondents either agreed or agreed strongly with this statement, which highlights the uniqueness of the service. Also the majority of respondents (70%) agreed or agreed strongly that CSS provides clear jargon

free advice, which would suggest that the amount of detail and the register of language used are pitched at the right level.

There is strong emphasis placed on quality assurance in the running of CSS. Monthly controls of answers are made by the contractor ECAS and by DG Internal Market and Services. Given the limited staff resources allocated to CSS within DG Internal Market and Services (circa 2 – 2.5 full-time equivalent (fte) staff), it is questionable whether such a high focus should be placed on quality assurance of the experts, when this is carried out by the contractor anyway. This is particularly significant in the light of the fact that only 0.25 fte staff is allocated to promotion of the service, which is the main weakness of the service acknowledged by those inside the unit, the DG, other DGs and outside the Commission. (It is important to note that the task of promotion of a Commission service to the EU public is challenging.)

The contractor ECAS checks the quality of circa 40 responses per month, which are selected at random, and reports that responses consistently meet a good performance ratio²⁴ of circa 80%. This is backed up by quality assurance checks carried out by DG Internal Market and Services which suggest that overall the quality of most responses is at least satisfactory with 64% rated as good or excellent.

QUALITY OF ANSWERS PROVIDED BY CSS EXPERTS ACCORDING TO DG MARKT'S QUALITY CONTROL					
Quality	2002 (*)	2003 (**)	2004	2005	Total
Excellent		19	179	80	278
Good		60	540	184	784
Satisfactory		36	298	112	446
Unsatisfactory		9	111	43	163
Total		124	1128	419	1671

* No data was available for 2002,

** Data was only available for the months of November and December

Quality assessment criteria are established in the contract signed with ECAS. There is no direct contract between the Commission and experts. Experts receive training on quality standards in the training session organised by the Commission. Quality standards are regularly discussed between DG Internal Market and Services and the ECAS management team.

Quality Assurance procedures aim to score the qualitative appreciation of answers provided and are, therefore, somewhat subjective. This is acceptable as there appears to be no opportunity to take a more scientific approach. DG Internal Market and Services is satisfied that the level of quality is sufficient,

²⁴ The ratio is based on the calculation of to what extent responses meet the CARE (Clear, Accurate, Relevant, Enabling) criteria.

given the complexity and diversity of enquiries to the service, that experts are limited by the amount of information provided by citizens, and the fact that experts' performance can sometimes vary. Those at ECAS confirm that sometimes experts perform to different levels on different types of questions. The contractor monitors experts' performance providing additional training and support where it is needed, and will terminate an expert's contract if his or her performance is persistently poor. However, the contractor is in a difficult situation, given that it is difficult to find legal experts willing to work remotely, on a self-employed basis, in a sector that can offer high fees.

Both TEP and DG Internal Market and Services consider the quality of answers provided by experts as to provide a good level of assistance to citizens. Nevertheless, there is evidence to suggest that this area still requires attention. The contract with ECAS requires that answers are provided to a uniform standard, yet the above table highlights that there are different levels of quality of responses (satisfactory, good and excellent). The results of the on-line satisfaction survey highlight the diversity of views of respondents with nearly 20% of respondents feeling neutral and nearly 20% disagreeing with the statement that CSS provides high-quality legal advice.

Further investigation is required as to how to increase the uniformity of quality. For example, a detailed analysis of responses that have been graded as unsatisfactory and how to improve satisfactory answers could be undertaken. ECAS has reported that experts are limited in their ability to provide a good answer by the level of detail that citizens provide in their enquiry. The impact of encouraging experts to ask for more²⁵ information before answering an enquiry should be considered. In addition, experts report that greater interaction within the expert group could also enhance the answers that are provided. Mechanisms to increase this interaction for example by increasing the frequency and level of interaction of group training should be considered. With regards to the result of the survey, it would be interesting to investigate why circa 40% of respondents were neutral or disagreed that high-quality advice is provided. If it is possible to match the profile of these respondents to their enquiries this would be useful. It is possible that the reason for this response was that citizens did not understand the scope of the service or were expecting a completely different answer.

With regards to the format of replies there is scope for improvement. There can be cultural differences in the way that responses are provided. The Anglophone approach tends to include a salutation at the start and end of a response, uses the name of the citizen if this is provided, thanks the citizen for contacting the service, and offers further assistance if required. Other linguistic approaches maybe more direct, and focus on answering the enquiry in the fullest sense, but read like an entry into a database rather than an e-mail to a citizen. While the latter approach cannot automatically be judged to be poor quality, the lack of

²⁵ This suggestion from the contractor seems to be reasonable and would help add value for citizens.

standardization of the format of responses reduces the perception of professionalism. Respondents to the users' satisfaction survey indicated that the main advantage of CSS was the opportunity for a personalized response. Citizens place a high level of importance on their own individual interaction with an expert. It is recommended that the format for responses is standardized and that this format takes the most personalised format on offer.

3.3 MANAGING THE CITIZENS SIGNPOST SERVICE

This section provides an analysis of the overall management of the Citizens Signpost Service as carried out by the contractor ECAS and by those responsible for the CSS within Unit A4 of DG Internal Market and Services. A specific focus is placed upon promotion and communication of the service as this review highlights that this is one of the main aspects of the service that needs to be urgently addressed.

3.3.1 STRATEGIC AND OPERATIONAL MANAGEMENT

The management of Citizens Signpost Service has been outsourced to a contractor ECAS, which contracts out signposting and advice provision to legal experts, located both in the Member States and Brussels. It would not be feasible for DG Internal Market and Services to either coordinate and manage the team of external experts or to provide legal advice, due to the limited resources available in-house (a maximum of 2.5 full-time equivalent posts over the last 3 years).

The contractor's organisation of resources is effective given that the central management team cover the following key aspects:

- training,
- legal update,
- quality assurance,
- reporting and attribution of enquiries to experts

As several members of the team are legally trained, they also work as experts. ECAS has an in-depth understanding of the functioning of the service, which provides added value. The approach to managing the experts is appropriate and there are no recommendations for changes to the set-up. ECAS provides overall direction, guidance and instructions to experts, and also ensures a detailed follow-up and individual attention to assist experts, as and when required. Experts find the legal updates and pointers provided by ECAS to be particularly useful.

Experts are contracted on a self-employed basis and combine working for CSS with another job. Experts are paid on a fee-per-question basis, which is the most cost-efficient option. Another important advantage of this set-up is that the advice is impartial. The independence of the service is a key feature that needs to be communicated. There are at least two experts who cover questions to each

Member State and they tend to be located either in the Member State or in Brussels. There is a turnover of between 10 and 20% of experts per annum, which reflects job changes and the fact that experts are highly skilled and work in a very competitive sector. The recruitment process is appropriate to ensure that highly-skilled competent experts are selected. Experts report that the use and standard of selection tests are equivalent to recruitment procedures in the field.

In addition to induction training, there is a 2-day annual training meeting to which all the experts are invited. While the training is useful, experts report that a more participatory approach with workshop-style sessions would be more appropriate than the current lecture format. There is little sense of teamwork among the expert group and the training sessions could be organized to provide more opportunities for experts to interact with each other. Experts suggest that greater interaction within the expert team would enhance the quality of answers provided to citizens, as experts will be more likely to contact each other for advice on different national situations. (Currently, experts mainly answer cross border questions on their own or refer to the other expert covering their country.)

Consideration could be given to asking experts to make presentations on key issues in their country, for example, and supplementing sessions with documentary information/packs instead of presenting these in a lecture format. Increasing the frequency of training sessions to two per annum would also help to bring the group together and would also improve contact between all involved; the experts, ECAS and DG Internal Market and Services. An indirect benefit of increased frequency of training would be that if the Commission decides to change the contractor at any point, it may be easier to retain the expert group, who are essential to the delivery of the service.

There is close and frequent informal collaboration between ECAS and the team at DG Internal Market and Services. This is underpinned by the formal meetings between the DG and the contractor, which take place on a regular basis every 2.5 months, to discuss the contractor's detailed monitoring reports, which describe the outcomes of quality assurance procedures carried out as part of the on-going monitoring of the service. The frequency and level of detail of the reports is appropriate to enable DG Internal Market and Services to have a good understanding of the functioning of the service. Reports are compared with the DGs own quality assessment of responses, which is possible because the DG has full access to the CSS database. The working relationship between the contractor and the DG has been effective and resulted in many discussions leading to improvements in the database and consequently the service. Now that the service can be considered to function highly effectively (all those involved agree on this point), the need for the DG to place such an emphasis on its own quality assurance of experts can be questioned, particularly as there is a need to place greater emphasis on internal and external awareness raising in the next phase of development of the service, which will not be possible without greater resources.

The contractor organizes its resources to ensure that it is able to meet its contractual obligations. The vast majority of enquiries to the service are answered within the 3 working day deadline, irrespective of the date or time of the request. This is an impressive standard. There appears to be little need to change the principles of the contract for the provision of Citizens Signpost Services. The deadline for responses, the number of languages and coverage of Member States, the requirements for the content of responses and the reporting requirements are appropriate. However, the format of responses and the possibility for experts to ask citizens for more information need to be addressed.

Another area for review is the cost structure of the contract for services. (A cost benefit analysis of the service is provided in **Chapter 4** entitled Questions and Tasks of the Evaluation) Currently, the contractor is paid to provide the Citizens Signpost Service in 20 languages and covering all 25 Member States on the basis of a set fee for the first 6,000 eligible answers and then on a fee per eligible answer up to 11,000 eligible answers. To date, the service has answered well under 5,000 eligible questions per annum. The threshold for eligible enquiries is too high and costs could be reduced with a lower fixed-fee charged. It seems appropriate to reduce the threshold until such time as the Commission is able to improve the usage of the service.

3.3.2 COMMUNICATION AND PROMOTION OF THE SERVICE

The Citizens Signpost Service is a high-quality, specialist service, which is accessed by a tiny minority of EU Citizens. In 2005, between 696 and 352 enquiries were made to the service each month (22% of which were not eligible). It is assumed that users of the service are already familiar with the EUROPA portal and to some extent aware of the functioning of the European Commission because there is little or no awareness of the Citizens Signpost Service across the Commission or within the EU Member States. During the evaluation, the representatives of several different European Commission services (including within DG Internal Market and Services) and national services repeatedly stated that most people inside²⁶ and outside the Commission do not know about CSS. Yet there is significant evidence that the CSS is a valuable service and that when citizens are informed there is an increase²⁷ in the take up of services. The Citizens Signpost Service has a lot to offer but it has not reached its potential.

²⁶ Low awareness of CSS inside the Commission is not representative of efforts that have been made by Unit A4, but suggest that this aspect needs to be reinforced, more strategic/top down, and focus on communicating the mutual benefits of linking with other information and advice services.

²⁷ Collaboration with Europe Direct Information Relay Centres leading to their dissemination of bookmarks in 2004 and 2005 is reported to have resulted in a subsequent increase of enquiries to CSS.

Unless people are informed that Citizens Signpost Service exists, only those with an awareness of EUROPA and the Commission are likely to make use of the service, and rates of usage will remain relatively low. This is a fundamental problem, which needs to be understood and addressed if CSS is to provide real added value to European Citizens. Since the start of the service, numbers of eligible enquiries have remained under 5,000 per annum. This enquiry rate is set to remain or decline in the future unless major efforts are made to bring the service to more people; a principle at the heart of national citizens advice services. The 'awareness issue' is critical to the long-term future of the service.

There are 5 key reasons which lie at the heart of the low awareness of the Citizens Signpost Service:

1. Insufficient human resource allocation
2. Insufficient financial resource allocation
3. Limited awareness-raising activities
4. Insufficient effective links to intermediary services
5. The scope of the service

The allocation of **0.25 full-time equivalent staff** members to promote an EU service for the general public is not sufficient. If DG Internal Market and Service decides to further develop the service, this issue needs to be urgently addressed.

STAFF RESOURCES ALLOCATED TO MANAGEMENT OF CSS WITHIN DG INTERNAL MARKET AND SERVICES		
Role	Responsibility	Time allocation
Head of Unit	Overall responsibility and strategic development of the Service	
Coordinator	Management of the Service and main point of contact for day-to-day relations with ECAS, strategic development of the Service	0.5
1 staff member	Technical aspects and the development of the CSS database	1
1 staff member	Promotion of CSS and generation of statistics	0.25
1 staff member	Quality assurance aspects	0.5
1 staff member	Contractual aspects	0.25

In addition to limited staff resources, the budget allocated to raise awareness of the service to the EU general public has been minimal. Since the start of the service the maximum amount allocated has been €121,909.94 to launch the service, with resources as low as €14,115.85 in 2004. It cannot be seriously expected that a budget of just over €14K is sufficient to raise awareness across the European Union. In 2004, this accounted for just over 1% of the total costs allocated to the provision of the Citizens Signpost Service. Between July 2002 and December 2005, the total cost of providing the CSS has been €3,479,422.79. During this period, (not including the web site, which is low-cost and comprises only 12 pages) only €227,666.09 has been directly allocated to promotional aspects. This accounts for circa 6.5% of the total costs of providing the service. The emphasis of the budget has been clearly placed on providing a

high-quality service but it appears that the need to tell people that the service exists has been realised and consequently not prioritised.

CITIZENS SIGNPOST PROMOTIONAL ACTIVITIES		
YEAR	BUDGET	ACTIVITIES/ MATERIALS
2002	€121,909.94	Leaflet SOLVIT/CSS
2003	€37,076.64	CSS Report, CSS bookmarks, posters
2004	€14,115.85	CSS Report, CSS bookmarks (some languages and DwC bookmarks)
2005	€54,563.66 ²⁸	CSS Report, mobile stand, CSS bookmarks reprint
TOTAL:	€227,666.09	

The impact of human and financial limitations has been to some extent compounded by the limited awareness-raising activities that have been carried out. To date, activities and efforts have focused on the production of promotional materials with limited opportunities for dissemination, when what is required is an awareness-raising campaign. The DG makes use of mailing lists held by OPOCE, and collaboration with other EC/EU coordinated services, which have had some impacts but greater levels of collaboration are required.

Although DG Internal Market and Services has an External Communication Plan, there is a need for a specific awareness-raising plan for CSS, which will also consider the name and branding of the service. The current title 'Citizens Signpost Service' does not explain the service provided. Instead, 'Citizens Advice and Signpost Service' could be clearer. Possibilities for a more enhanced presentation of the Cascade of Services should be considered, given that citizens do not need to know the internal workings of the Commission and the Cascade seems to be more effective for internal communication to other Commission staff. There may be a single slogan or message which could cover the range of advice and information services available, without the need to present a specific definition for each service. A common message could then be used by all services in a joint awareness campaign.

Despite limited human and financial resources, a coherent approach has been taken to the materials that have been produced. As highlighted below, the Annual Report, bookmarks, leaflets and web site have deliberately used the same colour scheme, visual elements and fonts in an attempt to create a unique CSS identity.

²⁸ The amount indicated for 2005 is a credit appropriation (reflecting the amount that has been committed but not yet paid).

It is not feasible to assess the potential/latent volume of users²⁹. Those providing citizens advice services within the Member States report that the number of enquiries that they receive relating to cross-border issues is minimal. There are no comprehensive, reliable statistics available to indicate the numbers of EU nationals, for example living and working in another Member State. DG Internal Market and Services produced data to suggest that this number of employed, unemployed and inactive citizens is currently in the region of 2 million. However, this figure does not take into account students, and those who may make use of CSS due to periodic travel or electronic transactions with another Member State.

In analysing CSS promotional possibilities, efforts should be made to consolidate and expand the existing user base rather than seeking to increase use by infrequent user types (those under the age of 18, homemakers and those not employed or looking for employment.). To date the majority of users circa 60% are aged 25 – 60. This is the main client group of CSS. The majority of the questions raised by this group relate to living or working abroad. Therefore, one potential avenue for CSS would be to add links from web sites popular among expatriates, Chambers of Commerce, and EU and national services for this group³⁰. Job seekers represent a significant proportion of this age group. This reinforces the need for links from the EURES network. 20% of users are aged 18 – 24. This group is the group, which holds the most potential for growth, and could be targeted via links with other Commission programmes for students (for example ERASMUS and SOCRATES) and organisations representing young people and students for example the European Youth Forum. Given that only circa 1% of users are aged under 18, it is not relevant to target this group.

To significantly enhance the take up of the service, there is a need for effective Internet and operational links to other related services. The results of the on-line survey, where 78% of respondents reported that they had found out about the service from the Internet, confirms the need for on-line promotion. End users need to be effectively guided to the service. There is a need to improve the presentation of the service on the Europe Direct web site. As far as the typical citizen is concerned Europe Direct is part of CSS. There are many other internal and external websites that should be requested to include a link on their web site to the service. Whilst the on-line survey form is well laid out and easy to understand, increased information on the CSS web site (case studies, testimonials) would make the service more attractive. Also, smart use of tags (for example) can make a web site more “friendly” to search engines. After all, more citizens are likely to go to Google for help than will ever contact Europe Direct or search via EUROPA.

²⁹ What is required is a classic market segmentation analysis, which goes beyond the scope of this evaluation: who are the possible users of the service, where can they be found; what services do they use in the Member States that would bring them close to CSS; what proxy measures need to be established to monitor CSS contacts with the population; who already has relationships with this group.

³⁰ However, implementation requires the collaboration of services external to DG Internal Market and Services.

A number of new strategies need to be pursued to make a step change in the awareness and usage of the service. CSS currently lacks presence in the Member States and increasing operational links with existing national citizens advice services, as well as with other similar Commission services, would immediately enhance impact. CSS needs to benefit from existing infrastructure rather than trying to start from scratch. There are several examples of other Commission services (EURES, ECC-NET) which link to existing infrastructure and services provided at the national level and as a result enjoy greater awareness and usage. Links are already planned between the CSS database and SOLVIT, as well as to the Research Mobility Centres. There is also scope for greater linkage between CSS and Eurojus, with the latter providing a face-to-face advice mechanism in the Member States to add to the telephone, e-mail and on-line mechanisms currently available.

To extend the reach of the CSS into the Member States, working with the citizens advice services at the national level, would bring distinct advantages. Greater cooperation could allow the CSS deeper penetration by taking the service where it is required by clients. This is a key lesson from citizens advice services in the Member States; there is a need to take the service to where it is required rather than expecting citizens to seek it out. To develop the service it is clear that greater human and financial resources will need to be allocated. Serious consideration should be given to the use of professional public relations and communication specialists to assist the DG with this task. DG PRESS recently used a media relations company to generate press coverage on Europe Direct with encouraging results. Given the synergy between Europe Direct and CSS there is scope for continued joint efforts in this area.

3.4 COMPLEMENTARITY WITH OTHER SIMILAR SERVICES

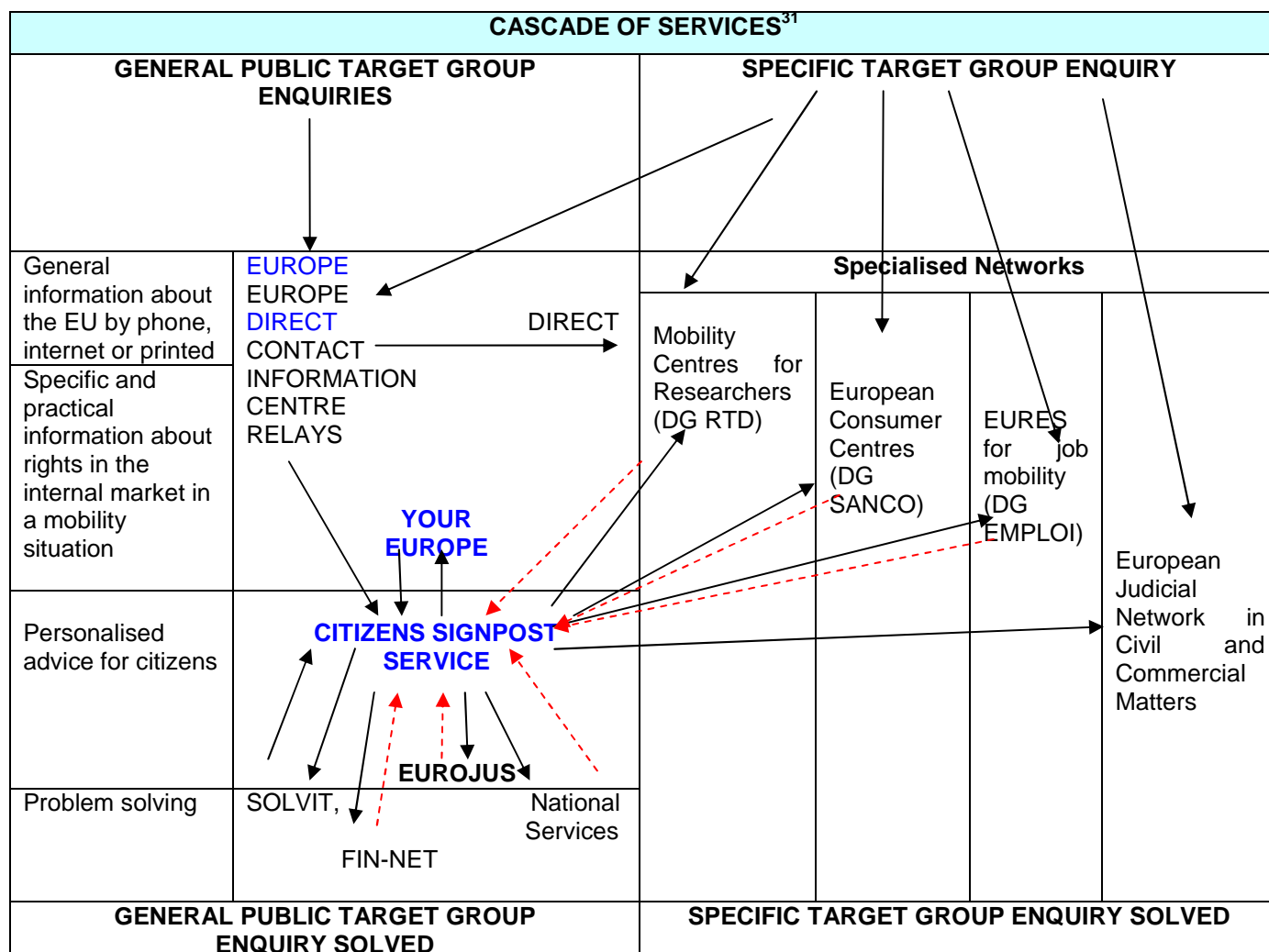
At European level, there are different services addressing citizens' needs. All these services can be organized as part of a cascade system of information, advice and problem solving so that users can get to the right service. These services fulfill different needs from general information to personalized advice and problem solving. They add value to national services provided to citizens by Member States' administrations, companies or organizations. A key element of the external assessment of the Citizens Signpost Service has been to evaluate the extent to which CSS is:

- complementary to other services with similar objectives;
- offers added value to other European Commission services; and
- contributes to synergies between tools set up at EU, national and regional level.

For this assessment, TEP took into account the following services: Europe Direct, Eurojus, SOLVIT, FIN-NET, the European Judicial Network in civil and

commercial matters, EURES, the European Researcher Centres, European Consumer Centres and IPM. In addition, the review took into account three Member State citizens advice services the Citizens Advice Bureau (England and Wales), Comhairle (Ireland) and Citizens Advice Bureau (Poland). Detailed analysis of these services including added value and potential synergies with CSS is provided in **Annex 5.3** to this report.

As highlighted above, the EU level, DG Internal Market and Services and its contractor ECAS have defined the range of services available as a cascade, which uses the image of generalist information services flowing into generalist advice service signposting to specialist services. The cascade description highlights that there is an overall synergy between the services on offer. However, the definition has not been formally articulated inside or outside the Commission and deeper investigation highlights that in many cases the potential for services to benefit from each other/to work together is not exploited. The synergies and information flows between services are presented in the below diagram, which also highlights where flows between services need further development, for example from national advice services and the specialised advice services such as EURES and the European Consumer Centres Network.



Key: **Blue** = main access routes to the Citizens Signpost Service
Full arrows = flow of enquiries to and from different services
 Dashed arrows = lack of or no flow of enquiries to the Citizens Signpost Service

As highlighted above, Citizens Signpost Service has great potential to act as an information hub for those with enquiries and problems related to the Internal Market, but this potential has not yet been fully articulated. There are strong synergies between Europe Direct and CSS. Europe Direct provides the interface for incoming telephone calls to CSS, and uses the CSS database to transfer enquiries. This high-level of operational collaboration provides an example of internal good practice. However, an immediate point of concern that should be urgently addressed with Europe Direct is the inadequate presentation of CSS on the Europe Direct web site. Given that Europe Direct is the earpiece of CSS, this

³¹ It should be noted that the above diagram does not highlight the flows between the different services, it highlight the potential and actual flows that relate to CSS.

is a problem that needs to be addressed. The Europe Direct web site needs to clearly state that *‘Europe Direct will also transfer citizens calls who require help to solve a cross border issue, such as ...’*.

There is also scope for closer collaboration with Eurojus. Both Eurojus and CSS provide free legal advice and signposting on Internal Market legislation, but there are some key differences indicated in the table below:

FEATURES	CSS	Eurojus
Responsible DG	DG MARKT	DG COMM (PRESS)
Member State coverage	All 25 Member States	12 Member States
Central database of enquiries and responses	Yes	No
Quality assurance	Yes	No
Centralised expert training	Yes	No
Legislative coverage	Internal Market legislation	All EU legislation
Citizens access	Telephone, e-mail, online	Telephone, email, face-to-face meetings

CSS operates using a more systematic process and offers greater geographic and linguistic coverage than Eurojus. Meanwhile Eurojus offers broader legislative coverage and the possibility of meeting citizens. Those responsible for Eurojus express an interest in Eurojus experts sharing training provided to CSS experts. It is suggested that the two services should meet to identify how CSS and Eurojus can be structured to increase the mutual benefit and strengthen their impact, for example by presenting the services under the same brand. This idea can also be applied to the presentation of SOLVIT, which already has a direct link to CSS via the CSS database³².

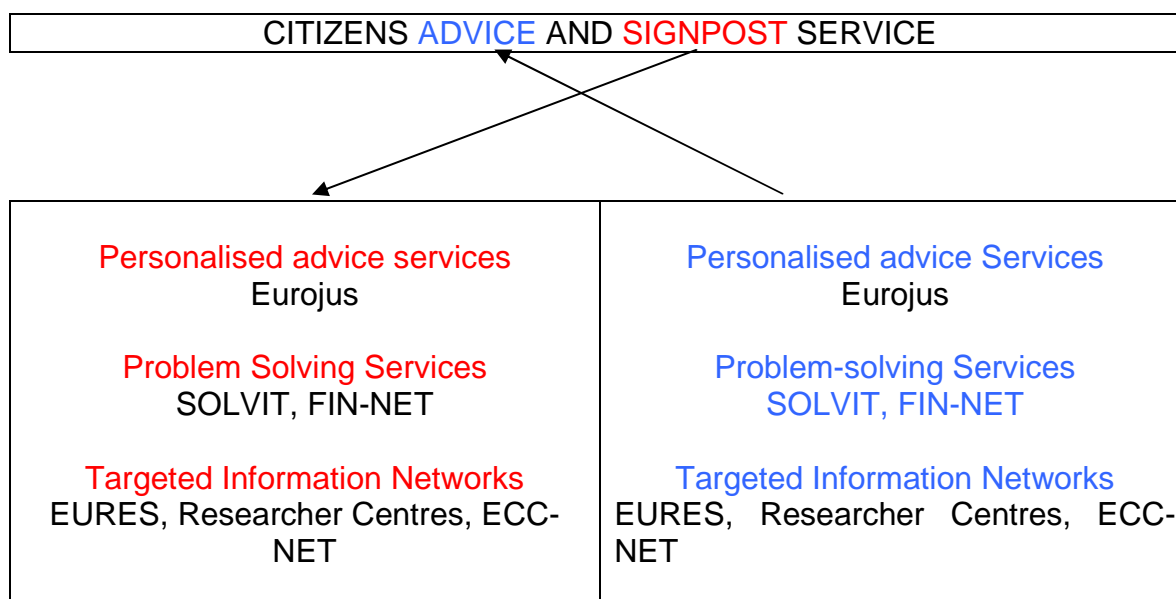
With regards to the Commission’s problem-solving services, such as SOLVIT, FIN-NET and the European Judicial Network in civil and commercial matters, the Citizens Signpost Service provides added value by signposting citizens to these services. However, CSS has perhaps the greatest untapped potential with regards to the Commission’s specialist advice services which have been decentralised to the Member States. For these services (EURES, the Researcher Mobility Centres and the European Consumer Centre Network), CSS is able to signpost citizens to take advice from the networks and also to provide legal advice to staff of the networks, which are for the most part staffed by generalist advisors. It is this latter aspect that is currently not yet developed, as highlighted in the above diagram. The Citizens Signpost Service is only available to EU citizens, but it could add further value if it were able to advise citizens advice networks by providing basic interpretation of EU Internal Market legislation at their request. This legal back up and support could also be advertised to national citizens advice services, particularly as those within national services consider

³² Links to allow enquiries from other services to be directly encoded in the CSS database are planned, including from the European Researcher Centres (ERA-MORE).

that this could be useful. Developing the service in this way would easily extend the reach of CSS and allow the very valuable service to have greater impact and benefit to EU citizens.

Whilst the CSS signposting service is fully operational, its legal advice service could be further developed with other Commission and national services using the CSS resource to the benefit of their clients. Discussions with representatives of these services highlight that there is little awareness of CSS within their networks and representatives themselves do not necessarily see the potential for CSS to provide assistance to their service. The name *Citizens Signpost Service* is indicative of the need to focus on the legal advice aspect of the service. Currently, the name gives no indication that legal advice is provided. In fact, the provision of legal advice has become the key differential between Europe Direct and CSS.

The mystery caller survey highlighted that Europe Direct operators have become very adept at signposting individuals to relevant points on the EUROPA web site but also to a range of services in the Member States. There is little sense in restricting the range of Europe Direct operators. Formally operators have instructions to pass on enquiries that relate to the scope of service provided by CSS. However, in practice if they are able to signpost effectively and citizens are content with the service then this is an added benefit. However, Europe Direct operators are generalists, who are unable to provide interpretation of the Internal Market legislation to callers and e-mailers to the service. This is the unique service that CSS can provide.



The above table provides an illustration of how CSS provides:

a signposting and advice service to citizens by signposting them to other EC services; and has potential to provide...

a signposting and advice service to other EC coordinated services (although this aspect is not fully developed).

The model of a specialist legal advice unit is one which is currently in operation in the UK. The Citizens Advice Bureau operates with a strategic head office and a network of generalist advisors who handle 5.5 million cases per year, via 500 local citizens advice bureau and 3.5 thousand CAB outlets in prisons and hospitals, for example. CAB advisors are generalists who make use of an in-depth knowledge basis, which is generally sufficient to meet their needs. However, there are also able to draw upon a single specialist legal unit that answers specific questions by telephone, mail and fax. It is this type of legal back-up that CSS could effectively provide to a range of more generalist advice networks at EU and national level. This approach fits clearly with the strategy of building upon existing infrastructures, and the need to target intermediaries rather than end users with promotional activities and evidence from national advice services that they would be receptive to this type of approach.

4. QUESTIONS AND TASKS OF THE EVALUATION

This section presents detailed analysis with conclusions and recommendations on the questions to be answered under this evaluation. A summary of these and additional conclusions and recommendations are provided in the Executive Summary at the start of this document.

The structure of this section follows the sequence of questions in the Terms of Reference to the evaluation, as follows:

Relevance of the Service

- The extent to which the CSS objectives are relevant to the needs of citizens and the European Commission

Effectiveness of the Service

- The extent to which the objectives of CSS are achieved
- The extent to which the CSS, as a service to citizens complies with the relevant quality criteria as set out in the contract

Efficiency of the Service

- How economically the resources used have been converted into results

Coherence of the Service and Synergies

- The extent to which the CSS is complementary to other interventions having similar objectives; offers an added value to other services of the European Commission; contributes to synergies between tools set up at EU, national and regional level;
- The extent to which the CSS produces benefits for citizens

4.1 RELEVANCE OF CSS

4.1.1 DOES CSS MEET THE NEEDS OF EU CITIZENS?

To what extent does the service provided by the CSS meet the real needs of EU citizens seeking to exercise their rights in the Internal Market?

i. With respect to citizens who have approached the service

In general, CSS can be considered to be meeting the information needs of the users of the service, of whom the majority are EU citizens. This conclusion cannot be extended to all EU citizens seeking to exercise their rights in the internal market as there will be those who are not even aware of the service and others that have never used it.

Results from the online user satisfaction survey show that circa **69% of respondents are satisfied/very satisfied with the responses they receive from CSS**. Further analysis of the results show that there were a slightly greater proportion of EU-10 respondents (73%) than EU-15 respondents (68%) who felt satisfied/very satisfied with the answers they received from the service.

Results of another survey question, to assess the importance of a service such as CSS for EU citizens, also proved particularly positive. **Over three quarters of respondents (77%) believe a service, such as CSS, is very important for EU citizens** and 17% of respondents believe that it is quite important. Very few respondents (3%) believe that such a Service is not important/not important at all.

ii. In terms of meeting citizens' wider needs/of the overall target population for the service/potential users.

In the above evaluation question, TEP considers the 'wider needs' of citizens as referring to those needs that are similar to the scope of the service, but fall slightly outside. Potential users are considered to be citizens who may have issues that could be helped by advice from Citizens Signpost experts.

The CSS has the ability to meet citizens' needs for interpretation of their basic Internal Market rights and signposting to relevant agencies at the national and EU level who are able to help citizens to solve their problems. In addition to the findings provided above, this statement is backed up by quality-assurance exercises carried out by ECAS and DG MARKT, which suggest that in the vast majority of cases, citizens who approach the service are provided with advice that should help them to advance their situation.

The service provided by the CSS has a defined scope. Enquiries must fulfil one or more of the following requirements:

- relate to a real, and not hypothetical, situation;
- concern an individual citizen;
- be specific (for general information, please consult the Your Europe website);
- come from an EU citizen (or someone closely related to an EU citizen and enjoying many of the same rights);
- relate to the Internal Market of the European Union;

Provided that citizens fulfil the above criteria, they may also request informal clarification of a legal text and/or information on national legislation transposing European legislation in a Member State (Internal Market topics). Enquiries from consultancies and legal practices are not considered to be eligible.

It is appropriate that advice is not provided to consultancies and legal practices. CSS is paid from public funds and is not used to support the commercial gain of private enterprises. However, CSS does not meet the wider needs of citizens whose enquiries fall outside the current scope of the service, but whose needs can be considered to be equally legitimate/relevant. For example, questions that relate to theoretical not real situations are outside scope, this excludes questions from citizens who may be interested in finding out their rights before they decide to take action. Citizens whose questions are outside scope currently receive a standard e-mail explaining that their enquiry is outside scope and pointing them to other relevant websites. Thus with regards to citizens whose questions are outside scope, it can be considered that the Citizens Signpost Service could do more to assist. However, there is a decision to be made as to the type of service that DG MARKT would like to provide.

TEP suggests that if DG MARKT wants to meet citizens' wider needs then a greater degree of flexibility is required in the definition of the service. A preferred model would be that CSS answers all questions that CSS experts are able to answer³³. However, it is necessary to be able to describe and define the service to attract the types of questions that experts have been trained to respond to. **One option could be to retain the current description of the scope of the service, but to provide a tailored response to ineligible questions rather than a standard reply.** Such a change would allow the service to better meet the 'wider needs' of citizens. This would mean an extension to the scope of the service implying a change in the contract. Furthermore, where CSS experts are unable to answer citizens' questions it is suggested that the contractor could be asked to try to **find another way of assisting by, for example, researching other possible information sources and by providing a specific rather than standardised answer to citizens**, even if the specific answer is not able to fully meet the citizens needs. This model would be much more user-friendly to citizens and would allow DG MARKT to be better placed to meet the wider needs of citizens. It is noted that the above suggestion reflects that type of approach to information provision followed by equivalent national services and some Commission services such as SOLVIT. The SOLVIT website claims *'If your case cannot be solved by the network, the local SOLVIT Centre will try to help you find another way to deal with your problem.'*

There is another aspect in which CSS does not meet the wider needs of citizens, which also relates to the scope of the service. CSS signposts citizens to appropriate services it does not aim to help citizens to solve their problems. In some cases, there can be confusion if citizens expect to receive the answer to their problem and do not expect to be passed on to a different service. However, it can be considered that with the current virtual set up with experts working on a fee per question basis, it would be difficult for CSS to actually solve citizens' difficulties, also that, in any case, this would cause some overlap with services

³³ Although it should be noted here that CSS provides legal advice and signposts citizens to appropriate services, but it does not aim to help citizens to solve their problems.

that already exist to perform this function. However, the planned direct link between the CSS database and SOLVIT, as well as with other advice services such as ERA-MORE, will help CSS to some extent to better meet some of the wider needs of citizens in the future, by helping in the ‘solving’ process.

With regards to the needs of potential users, there is a key limitation encountered by CSS, which relates to the relatively low and non-existent levels of awareness CSS across Europe. This statement is backed up by discussions held with other services both within DG MARKT and other Commission DGs, as well as those responsible for citizens’ advice services at the national level. CSS is limited to those users who are aware of EUROPA and seek out the service under their own initiative. **DG MARKT is hampered by extremely limited human and financial resources available to promote the service, but perhaps even more importantly, CSS is limited by the fact that it does not benefit from any existing national or European networks of services in place to provide advice.** There are several examples of decentralised advice services provided by the Commission (EURES, ECC-NET, ERA-MORE), which have all achieved much greater levels of usage/awareness than CSS. It can be considered that **the current main need for potential users of the service is to be made aware that the Citizens Signpost Service exists.** TEP suggests that if the CSS is to fulfil the latent demand that exists, it is necessary to make a step change in the volume and level of advice that can be provided to EU citizens. **The only way to achieve this is to link and integrate with services provided at the national level, which already have an established client base, and distribution and promotion mechanisms.**

In terms of meeting citizens’ wider needs, a clear strength of the service is that advice and signposting is provided by independent experts. Users of CSS are able to be open about the questions and difficulties which they have and to find out about the law that governs their situation without compromising their situation. Citizens may feel less able to be open with a service that is linked to a government or public administration service. Thus the service gives a sense of defending citizens’ rights.

Thus far this section has considered the specific and wider needs of citizens who are users and potential users of CSS, which relates to the first operational objective of the service. However, the second objective of CSS is to help the Commission to form a better understanding of the operation of the Internal Market in practice, and to identify issues which may still need to be resolved in order to improve its functioning. The need to provide feedback to the Commission was anticipated in the original conception of the Citizens Signpost Service. Since its inception, experts responding to enquiries from citizens have encoded their response into the Interactive Policy-Making (IPM) database as well as the CSS database, with a view to providing EC policymakers with insights into the functioning of the Internal Market. It is important to note that national citizens advice services see the provision of feedback and follow up of specific cases with

policy makers as a vital aspect of their function. **However, CSS has not yet been able to generate Commission or national level follow-up of particular cases, where the implementation of specific aspects of EU legislation needs to be strengthened.** (If these aspects were highlighted to representatives of the Member States as well as the EU institutions for example via case studies, press releases and policy papers, this could in theory lead to changes and improvements being made to the Internal Market.) However, an evaluation of the IPM initiative in 2005, highlighted that IPM was not an effective mechanism to inform the policy debate. Thus those responsible for CSS need to identify other mechanisms to address this objective, which is a challenge because there is currently no scope within the responsible unit (unit A4) to address this issue.

In addition to the needs of citizens and policymakers, **CSS has great potential to meet advice and signposting needs of other Commission and national public information and advice services.** This aspect has not yet been fully exploited. TEP's discussions with other Commission services for citizens suggest that they have a low awareness of the potential synergy with CSS, which could assist them with advice and signposting. Despite this, those responsible for CSS have started to address this possibility by enhancing the CSS database to allow the advisors of other Commission services (for example, SOLVIT and ERA-MORE) to encode their enquiries directly into the CSS database. It is interesting to note that those responsible for citizens advice services in Ireland, the United Kingdom and Poland have expressed an interest in accessing this type of support and TEP has recommended that DG Internal Market and Services follows up on this interest. However, it is understood that due to limited human and financial resources collaboration at the national level is likely to need to wait until the medium term.

4.2 EFFECTIVENESS OF CSS

4.2.1 IS CSS IN-LINE WITH CONTRACT OBJECTIVES?

To what extent is the service provided by CSS in-line with its objectives, as set out in the running contract?

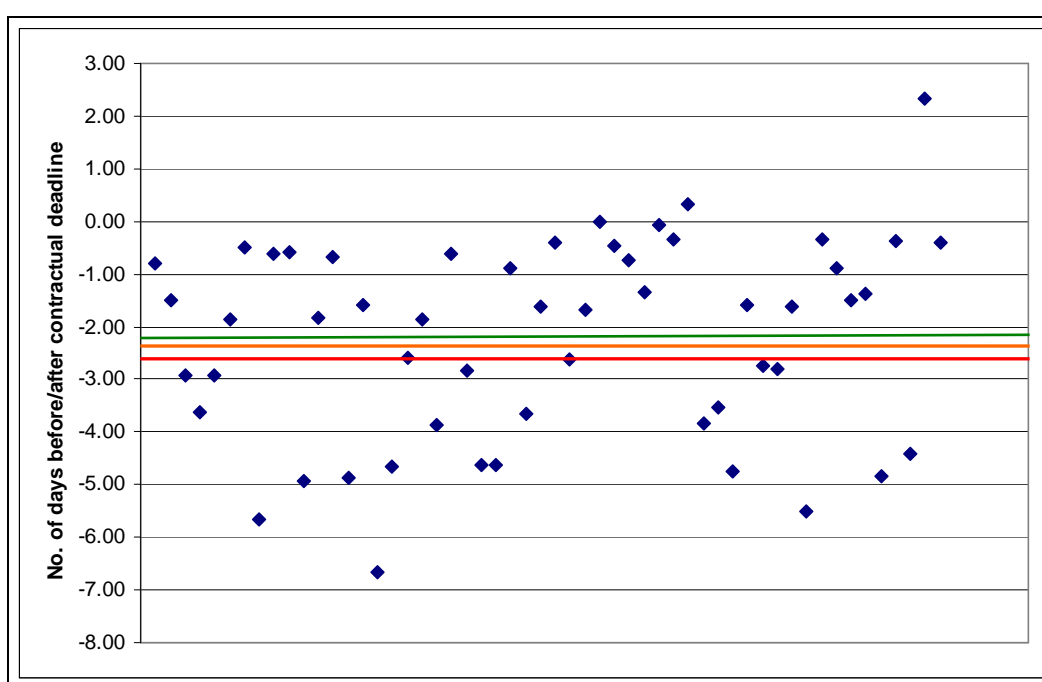
The Citizens Signpost Service is described as having two objectives:

- a) **to provide citizens with practical information in response to enquiries as regards the exercise of their Internal Market rights and on the next step to be taken by citizens in overcoming problems, which they may encounter in the exercise of these rights, and**

The service can be considered to meet this key objective. The scope of the service requires that to be eligible, enquiries must be submitted by citizens (not businesses) and must be specific, real situations that relate to the Internal

Market. Quality assurance carried out by both the contractor and those responsible for the service at DG MARKT ensures that the way that advice is provided is practical and meets the CARE criteria (Clear, Accurate, Relevant and Enabling). A review of the answers provided by experts shows that in each answer at least one, if not more, point/s of contact at the EU and/or national level are provided, so that citizens are informed of where to go to get help to solve their problem. Furthermore, CSS provides legal advice on the type of difficulty encountered by the citizen, for example his or her legal rights. The fact that responses are provided with 8 days means that they can be put to practical use by citizens.

The results of the mystery survey confirm that responses are received to enquiries well within the response deadline, as highlighted in the below chart.



The figures plotted on the graph above represent the response times of CSS to the mystery enquiries in comparison to the contractual deadline agreed with the CSS contractor which is 3 working days. A negative figure indicates the number of days before the contractual deadline whereas a positive figure indicates the number of days after the contractual deadline.

As the graph illustrates all the enquiries were responded to within 8 days (the deadline promoted to enquirers) and the vast majority of the enquiries (all but 2 enquiries) were responded to within the contractual deadline. In fact for all enquiries the average response time was 2.2 days (52.85 hours) before the deadline (see orange trend line).

With regards to mystery enquiries submitted via the on-line survey, citizens were signposted to other sources of information in all by 5 cases (4 of which relate to questions being deemed ineligible and 1 question which did not include signposting). Responses received were rated as to the extent that the enquirer felt better equipped to deal with the issue, with the result that over 80% agreed or agreed strongly that the CSS had improved their situation. Just under 80% agreed or agreed strongly that the response provided was sufficient so that they would know what to do next. These levels of response reflect the quality assurance rates measured by the contractor responsible for the delivery of the service ECAS.

b) to help the Commission to form a better understanding of the operation of the Internal Market in practice, and to identify issues which may still need to be resolved in order to improve its functioning.

It can be considered that the way that the Citizens Signpost Service is currently set up allows members of the DG MARKT team who are involved in the running of the service to gain insights into particular problems that EU citizens are facing within the Internal Market. Specific issues are also raised from time-to-time by the contractor both at meetings of the CSS steering group and via ad hoc reports, although there is no contractual obligation for the contractor to provide these reports.

Enquiries and responses provided to EU citizens are encoded into the Interactive Policy Making database, as well as in the Citizens Signpost Service. One of the purposes of IPM is to provide a feedback mechanism as a source of information to policy makers. However, in reality IPM has not proved to be an effective mechanism for informing the on-going policy debate. This was highlighted by the findings of the Mid-term Evaluation of IPM³⁴:

‘Basic levels of awareness of the feedback mechanism are generally quite low across the Commission. ...Usage of the feedback mechanism is very low across the Commission. There are no reports to quantify exactly how many people have used the Mechanism; however, estimates indicate that at most between 15 and 20 people have used it over the past year’.

Furthermore, the evaluation reported that there is a weakness in the reporting of cases from the Citizens Signpost Service to the IPM database, because all cases were reported whether or not they are relevant. **Given this situation it is concluded that the current mechanisms used to develop policy lessons do**

³⁴ See Page 4, Section 1.3.1.1. Conclusions relating to the IPM Feedback Mechanism Framework Contract No: BUDG-02-01 L2, Specific contract number: BUDG/01/EVAL/2003/20 (PRS/2004/IMA/A3/76)

not appear to be particularly effective. However, it should be taken into account that DG MARKT no longer has responsibility for the IPM feedback mechanism for policy making purposes and that CSS had been reliant on IPM to ensure that this policy-making aspect of its function was executed. This presents a conundrum, which was highlighted by the contractor ECAS. **DG MARKT is responsible for a service, which gathers a vast amount of data that could be potentially highly relevant to policy making, but this opportunity to create impact is not being fully maximised.**

Comparison with other similar services at the national level and European level highlights that many place a high level of importance on maximising any data that is gathered to inform policy makers, examples include all three citizens advice bureaux included in the exercise, as well as the European Consumer Centres, who interact at a national level. In these cases, the neutral position of the organisations is considered to be a strength and those interviewed suggested that feedback is generally well received by policy makers and has had some achievements in terms of changes made to legislation at the national level. Feedback is provided in the form of detailed discussion papers, which present the difficulties being faced by citizens and make suggestions for changes required to policy and/or legislation. These examples seem to suggest that feedback to policy making is an important function, which should continue to be included, but needs to be reinforced as part of the remit of a service such as the Citizens Signpost Service.

Based on the evidence: the relatively limited impact of IPM; the potential for greater exploitation of data; that this function is given great emphasis by similar services and can lead to results, **TEP recommends that efforts are made to reinforce this aspect by identifying a mechanisms for the generation and targeted dissemination of policy feedback papers.**

4.2.2 IS CSS EFFECTIVE AT MEETING ITS CONTRACT OBJECTIVES?

To what extent is the service – as it operates at present – an effective means for meeting these objectives?

Given the fact that the first objective is quite general³⁵, it does not give specific targets for numbers of citizens assisted for example, it can be considered that the Citizens Signpost System as it operates at present is an effective means for meeting this objective. There are very few complaints from citizens, and those operating the system (the contractor) and managing the system (DG MARKT) confirm that the service runs smoothly and effectively with a consistent high level of quality with regards to advice and signposting provided to citizens (circa 80%

³⁵ This raises a question as to whether such a general objective is helpful, and whether it would be better to include a set of more precise targets within statements on the definition of the service?

of responses meet the CARE³⁶ quality assurance criteria according to the contractor).

However, whilst the service operates with the utmost efficiency, and this evaluation suggests that it could be used as a model for new advice-services that could be used elsewhere in the Commission, it must be understood that the effectiveness and impact that the service is able to provide for EU citizens is relatively minimal. There is a minimal level of awareness of the service across the EU and both the contractor and DG MARKT report that awareness raising and promotion are the key challenges of the service.

However, if the Commission is considering how to take the service to a next level of its development, then there are two aspects in particular, which will require consideration: whether structural changes are required to open up the service to more EU citizens – for example how and whether to align the service with other EU Commission services and/or national public services; how to increase awareness of the service. It appears from TEP's review of complementary Commission advice services that where Commission services are managed centrally it is difficult/not feasible to generate high levels of awareness among the EU general public. However, when advice services are aligned with existing national structures then use of existing distribution and promotion mechanisms allows the services to generate a much higher volume of enquiries. On the other hand, these decentralised services do not tend to operate such high-standard quality-assurance and data-gathering mechanisms as those used by the Citizens Signpost Service. **There is a choice to be made in terms of the ambitions of the service, should it be:**

- **High volume, broader content scope, with lower levels of control/quality assurance and management information, or**
- **Lower volume with more focused scope, high levels of control/quality assurance and management information.**

Perhaps, the next step is essentially to decide what the ambitions for the service should be and to redefine the objectives to meet these new ambitions. The service can remain as a niche operation, providing a high quality service to those who manage to seek it out or it can become much broader and available to more citizens. This decision will need to be followed through with decisions on a range of operational aspects including budgetary allocations for promotion. To date, the budget for promotional aspects has been relatively limited ranging between €121,909.94 for the launch of the service to €14,11585 in 2004. If the service is to be truly targeted at the EU general public – or those members of the general

³⁶ The CARE criteria used to assess the quality of responses are clarity, accuracy, relevance and enabling.

public who are in a cross-border situation³⁷ then the current budgetary allocation cannot be considered to be sufficient to have an impact. However, there are a number of low cost options, for example increasing and improving links via Commission and web sites of equivalent national services³⁸, and giving presentations of the service to a range of internal and external audiences, that can be taken up, which could help to increase awareness within the niche group that has some awareness of service provision at the EU level.

With regards to the second objective of improving understanding of the Internal Market operation in practice and identifying issues that still need to be resolved to improve its functioning, it needs to be taken into account that DG MARKT no longer operates the IPM feedback mechanism. This poses difficulties for the DG to meet the objective of helping the Commission to form a better understanding of the function of the Internal Market. From an operational point of view there are a number of constraints to meeting this objective:

- the generation of discussion papers is not included within the scope of the contract with ECAS³⁹;
- the CSS team within DG MARKT is limited to circa 2.0 full-time equivalent posts⁴⁰, who are already fully occupied with aspects of running the service and do not have the time for this additional aspect;
- DG MARKT no longer operates the IPM feedback mechanism;
- other policymaking DGs may not be receptive to reports which highlight weaknesses in their policy areas.

However, TEP suggests that consideration could be given to changing the current situation by including the provision of policy-feedback reports within the scope of tasks of the contractor, or by refocusing the tasks of the current team within DG MARKT to cover this aspect. For example, currently DG MARKT places a strong emphasis upon the quality assurance of the contractor and the work of the experts. However, staff members at DG MARKT report that they are satisfied that the level of accuracy and quality of responses provided to citizens and over time a level of trust has developed that the contractor provides a high-quality service. Given this satisfaction, DG MARKT could consider pursuing a different approach to quality assurance, for example DG MARKT could make spot checks 4 times per year and use the data provided by the contractor as evidence of quality. After all, the contractor is being paid to quality assure its work. This would free up DG MARKT staff to draft discussion papers. However,

³⁷ There are no accurate figures for the numbers of citizens who fall into this category currently on record.

³⁸ However, it should be noted that only few EU Member States provide citizens advice type services mirroring the types of issues that are covered by CSS.

³⁹ In comparison, the external contractor responsible for the delivery of the Europe Direct service, provides DG PRESS with detailed feedback reports.

⁴⁰ There have been slight increases and decreases to this number of persons overtime, for example in August 2005 there were 2.5 fte posts.

in reality the current DG CSS team has no possibility to develop policy feedback reports.

This highlights another potential difficulty raised above the fact that colleagues in other DGs may not be particularly receptive to papers from the DG MARKT CSS team, which highlight weaknesses in their policy area. However, TEP recommends that time is put into considering how this issue could be got around. There are several suggestions:

- There may be scope to setting up a working group of Commission advice services, which could present papers on policy areas that need to be reviewed, which might have more strength than the actions of an individual unit.
- Other DGs may be more receptive if they are asked to identify problem areas for which evidence is sought. This would make the exercise more need-driven with CSS providing a service to the other DGs.
- DG MARKT could play a role in facilitating the passing of information developed by the contractor to other DGs, and perhaps organising workshops (and/or press briefings) on a half yearly basis, which could be used to provide information to policy officers in other DGs. These efforts could also be useful in eventually generating press coverage by showing how the Commission can help EU citizens and the benefits of the Internal Market.

On this point, it must be understood here that TEP is limited in its ability to solve internal communication issues. Also, that it is first necessary to convince those with hierarchical responsibility for the service that such action is required.

Given that IPM does not appear to have the impact on policy-making that was originally expected, it can be considered that more proactive efforts are required to meet this objective. A decision is required as to whether to re-focus the objective so that the service is not required to have an input into the policy debate or whether to allocate resources to additional efforts to be actively put this aspect into place. **The Citizens Signpost Service presents a real and important opportunity for genuine dialogue with citizens and the potential to raise awareness of the benefits of the EU to European citizens.** Therefore, TEP recommends that serious consideration be given as to how to maximise the opportunities to have an input into the policy debate.

4.3 AWARENESS OF CSS

How do users of CSS become aware of the service?

The *Internet* (specifically the *Europa website* and via *search engine queries*) seems to be where most users first become aware of CSS.

41% of survey respondents cited EUROPA followed by 22% and 15% who cited Internet Search Engines and the Internet in general, respectively. These figures together constitute circa 80% of respondents. This illustrates that the **Internet**, in some way or another, has provided the platform for CSS promotion. The fact that such a high number of respondents found CSS via the **EUROPA website** also indicates that many users may have existing knowledge of the EU.

Awareness of the service via other media such as newspaper advertising and printed information on the EU (for example, leaflets and publications) was relatively low in comparison to the above Internet sources. This relates to the fact that there has been little promotion of the service using these means. To date, materials developed include Annual Reports targeted at MEPs and other EU level stakeholders, book marks and a joint leaflet with another DG Internal Market and Services service SOLVIT, as well as two posters and an exhibition stand. In addition, a video-clip and promotional buttons have been produced and an electronic newsletter is soon to be launched. Dissemination has been limited by the willingness/ability of other services approached to assist and the time required to create new dissemination opportunities, for example within the Member States. This situation reflects the minimal human and financial resources which have been allocated to date on this aspect, as well as the lower strategic focus awareness/communication planning (in contrast to other operational aspects) and the limitations of the structure of the service which does not currently allow penetration into the Member States. This situation poses serious questions for a service that is targeted at the EU general public. However, it is encouraging to see awareness of the need to increase the focus on this aspect by those responsible for the service. It is reported that the materials that have been produced can be used by the DG in the implementation of the next phase of communication planning and implementation, which could in theory (depending on available human and financial resources) become the next priority for the DG, now that the functioning of the service has reached an optimal stage.

4.4 QUALITY OF CSS

4.4.1 HOW SATISFIED ARE USERS WITH THE SERVICE?

What is the general satisfaction⁴¹ of citizens with the quality of the service in terms of response time, language used, quality and adequacy of the information provided? What aspects of the service are considered most/least satisfactory?

Overall, users of CSS are positive about the service they receive.

⁴¹ Regarding the interpretation of results: it should be noted that scores of 70% or over give strong confidence in a particular value of the service, whereas scores of under 60% suggest that there is still scope for improvement.

As mentioned previously, survey respondents expressed a high level of satisfaction to the answers they receive from CSS with circa 69% stating that they were satisfied/very satisfied with CSS responses.

Respondents were also asked to rate other aspects of the service. CSS received positive feedback on the following aspects of its Service. Over 50% of survey respondents agreed/agreed strongly that CSS:

- is easy to find.
- provides advice that would have to be paid for elsewhere.
- provides high quality legal advice (legally sound and relevant).
- has improved perception of the EC.

There were two aspects of CSS that received particularly positive feedback. Over 70% of respondents agreed/agreed strongly that CSS:

- provides advice that would be difficult to find elsewhere.
- provides clear advice and avoids jargon.

At present, the **personalised response**, the fact that the service is **free of charge** and **available in 20 community languages** seem to be the main advantages recognised by survey respondents.

The fact that the majority of respondents to the survey would use CSS in the future (81%) and furthermore, would also consider recommending it to family, friends and colleagues (83%) are other factors that demonstrate user satisfaction levels. These results also demonstrate the relevance and sustainability of CSS.

It must be noted that, although feedback was generally positive/neutral, there were two aspects that received higher levels of negative feedback than the others. Circa 25% of respondents disagreed/disagreed strongly that CSS:

- is easy to find.
- provides high quality legal advice (legally sound and relevant).

In response to the open question in the survey, where respondents were asked to comment on the service and make suggestions for improving it, 65% of comments related to the promotion of CSS and how it needs to be increased. This type of comment is in-line with the fact that circa 25% of respondents did not agree that CSS was easy to find.

Results of another set of survey questions aimed at assessing the outcome of CSS enquiries were still quite positive but less so than those listed above. For example, the two aspects that respondents agreed with the most were that the responses from CSS:

- had given them a better understanding of their European rights (64% agreed/agreed strongly).
- had provided them with information that helped them understand their situation (60% agreed/agreed strongly).

To a lesser extent, respondents agreed that CSS:

- was able to solve their problem (42% agreed/agreed strongly).
- had empowered them to take action (47% agreed/agreed strongly).
- had provided them with contacts able to help solve their problem (38% agreed/agreed strongly).

4.4.2 HOW ARE NON SATISFIED USERS TREATED?

Is the contact system (in case of having no/unsatisfactory answer) for citizens an effective tool? Where a citizen is not satisfied with the service are the means provided for follow up adequate?

According to the contractor there are very few complaints from citizens received by the service. In 2005, it is estimated there circa 20 complaints were received relating to the total of 5,678 enquiries. Therefore, it can be concluded that due to the efficiency of the service this is a relatively small issue. When a complaint is received it is reviewed by the legal coordinator within the contractors' management team and discussed with the expert to whom the complaint was attributed. The expert is then asked to make contact with the citizen either by e-mail or by telephone and invites the citizen to submit another enquiry. It is reported that CSS experts have been provided with guidelines as to how to deal with this type of issue. The majority of complaints relate to the fact that citizens do not understand why their enquiry has been considered to be out-of-scope or incomplete.

The fact that guidelines have been drawn up to deal with this issue, that a procedure has been established for dealing with complaints and that each individual complaint is given individual and personal attention demonstrates that complaints are taken seriously by the service. It can be considered that any service, which deals with the general public is likely to receive complaints every now and again. **The CSS appears to provide sufficient follow up to deal with dissatisfied clients and that this is a minimal issue given the scare number of complaints received. There appears to be no need to make changes to current procedures.**

As a means of handling complaints the contact system appears to be appropriate. Ideally complaints should be resolved with a telephone call as this represents a more personal form of communication than an e-mail. However,

given that citizens are not always available/they do not always give a telephone number this is not always feasible. CSS uses both telephone and e-mail to follow up. The contact centre is appropriate given that enquiries are automatically provided with a unique reference number, which allows the handling of interactions with citizens to be monitored both by the contractor and the Commission managers.

4.4.3 HOW ADEQUATE ARE THE CSS CONTACT MECHANISMS?

Are the ways to contact the CSS (telephone, e-mail and forms on the CSS web site) adequate for citizens?

The vast majority of CSS users contact the service via the online web form and opt to receive an email response. A minority of users contact the service on the telephone via Europe Direct and receive an email response. Another minority group of users use the web form or Europe Direct and request a telephone call back from CSS.

These usage patterns were confirmed in the results of the online survey with **70%** of respondents stating that they preferred to contact CSS via the online web form and only 7% stating that they preferred to access the service by telephone via Europe Direct. 23% of respondents stated that they did not have a preference one way or the other.

It should be noted here that the fact that there are already three different mechanisms available⁴² provides a degree of flexibility to citizens. It is suggested that particularly for highly complex questions, where citizens are required to describe in detail their problem to enable CSS experts to provide a response, e-mail and on-line formats are more suitable. However, the ability to have telephone contact gives citizens a sense of immediacy and a human interaction with the European Commission (indirectly) and this can be considered to be a distinct advantage. Meanwhile an e-mail response can also have high value as it provides a record to citizens of the course of action that they should take, which might be more difficult to note down during a telephone conversation.

That citizens are not able to speak directly to experts when they make an enquiry may cause a slight frustration for telephone enquirers (they speak with them directly when they receive the answer requested by phone). However, with regards to the adequacy of the service, the fact that citizens are able to make an enquiry by telephone, and request to receive an answer by telephone, which is then provided by a CSS expert, means that this aspect can be considered to be

⁴² These three mechanisms are: 1) Telephone via EUROPE DIRECT; Use of CSS web form; Use of EUROPE DIRECT, SCAD PLUS and YOUR EUROPE mail boxes (in this category of cases, questions are sent to EUROPE DIRECT which transfer them to CSS when appropriate).

adequate for citizens. The fact that legal experts are not answering telephone calls makes the service more efficient. As it is not feasible to answer enquiries on the spot, legal experts' time is best prioritised on answering enquiries rather than acting as call centre operators, a service that is already provided by Europe Direct. **The cooperation between Europe Direct and CSS provides an excellent example to the Commission of how two different DGs can combine their services to meet the needs of the general public.**

Currently, face-to-face contact with experts is not offered as part of the service, although it is offered by certain other Commission coordinated services, for example Eurojus. It is understood that the option of providing face-to-face advice is currently under consideration by DG MARKT for the future call for tender for the provision of Citizens Signpost Services. However, the evidence suggests that this option needs to be carefully considered. On the one hand, TEP suggests that there is likely to be some interest in this possibility, as reflected by the fact that some citizens arrange face-to-face consultations with Eurojus experts. However, it is likely that this interest will prove to be minimal because most people have limited time to make face-to-face appointments, and because unless there are lots of advisors in different regions most people will live too far away from an advisor. It should also be taken into account that the target group for the Citizens Signpost Service is relatively focused. Therefore, any new approaches which involve face-to-face presence should be focused upon locations where there are known to be a high number of nationals from other Member States for example major cities, and those particularly close to an EU Member State border.

On the other hand, feedback from national Citizens Advice Bureaux suggests that the telephone and e-mail are adequate mechanisms for the provision of information to the general public but that where advice is required to solve urgent problems then face-to-face meetings are more appropriate. Given that CSS experts do not aim to solve citizens' problems this could suggest that there is perhaps limited justification and need to establish a mechanism for the provision of face-to-face meetings.

if it is decided that the provision of face-to-face services is a desirable option, there is strong evidence from other Commission services (EURES, ECC-NET, ERA-MORE) that to be effective, **Commission advice structures need to build upon existing national structures and networks (in countries where these exist).** TEP suggests that **CSS should focus for the most part on remote provision via telephone, e-mail and on-line, whilst reviewing the possibilities to strengthen presence at the national level by linking with existing advice providers, by for example providing specialist legal advice and training to national advice providers.**

4.4.4 HOW SATISFIED ARE USERS WITH CSS RELEVANCE/ACCURACY?

What is the users' satisfaction in terms of relevance/accuracy of the replies provided under the criteria established in the contract?

Generally, users expressed satisfaction with the relevance / accuracy of the replies sent by CSS. Results of the online survey show that circa **70%** of respondents were satisfied/very satisfied with the answers they receive from CSS.

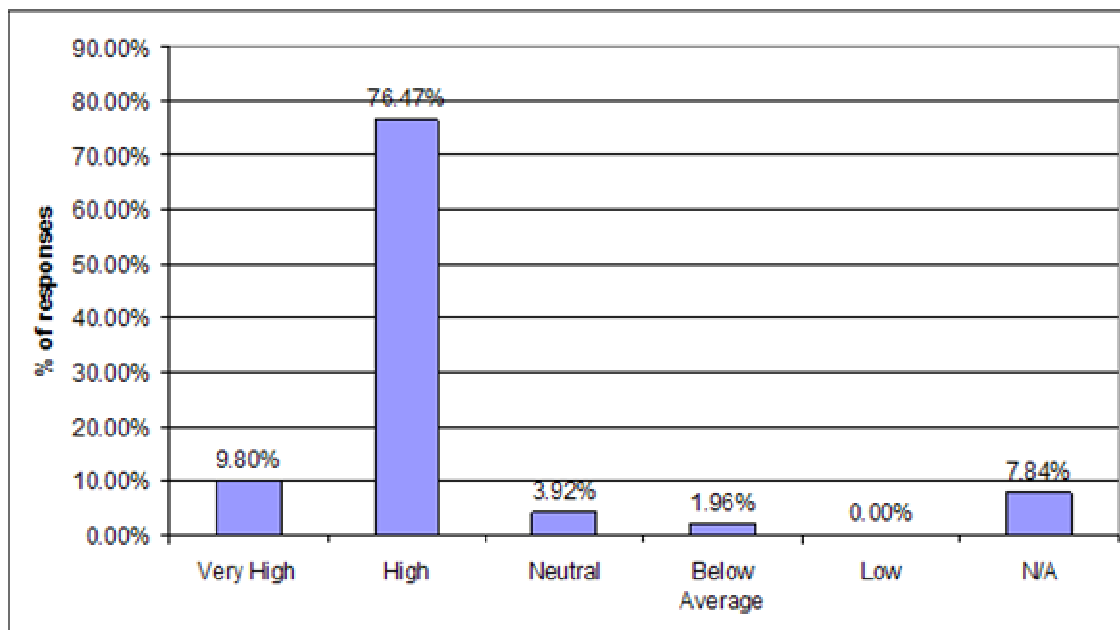
Results from other questions in the survey confirm the above.

52% of respondents agreed/agreed strongly with the fact that CSS provides high quality advice. Although, overall this result was quite positive, it should be noted that this aspect was one of two that received a higher level of negative feedback as 18% of respondents disagreed strongly and 7% disagreed that CSS provides high quality advice.

When respondents were asked about the outcome(s) of their CSS experience(s), two aspects that respondents were the most positive about were that the responses from CSS:

- had given them a better understanding of their European rights (**52%** agreed/agreed strongly with this statement) and
- had provided them with information that helped them understand their situation (**49%** agreed/agreed strongly with this statement).

TEP set up a team to test how the CSS experts responded to questions posed via the on-line survey, e-mail and telephone. Experts were not informed that the survey was taking place. The results of this survey give confidence in the high quality of responses being provided, see below:



Furthermore, test callers and e-mails evaluated the extent that the responses that they received fully answered all aspects of their question. The majority 80% either agreed (60%) or agreed strongly (20%) that this had been the case. Overall, 68.63% stated that they were satisfied with the response that they had been provided and 13.73% stated that they were very satisfied.

4.4.5 HOW USER-FRIENDLY ARE THE CSS DATABASE, WEBSITE AND FORMS?

For the purposes of this exercise, TEP defines user-friendly as being easy to access and to use and with a structure/navigation, content and presentation that work together to facilitate access.

4.4.5.1 The CSS Database

The database is used by four types of users, those in DG MARKT responsible for the service, ECAS, the CSS legal experts and citizens/users of the service. Each type of user has different access rights as indicated in the below table.

ACCESS RIGHTS TO THE CSS DATABASE			
Administrators	Managers	Experts	Citizens
Able to view all fields Able to add and modify experts and non-working days Not able to modify attribution Not able to modify the reply provided.	Able to attribute incoming enquiries to experts. Able to reply to citizens. Able to view the way enquiries are handled throughout the process. Not able to modify any interfaces in the database.	Able to introduce a response to enquiries they have been attributed. Able to view enquiries and responses from other experts. Not able to view the names of other experts in connection to enquiries. Not able to view other fields or to modify the database in anyway.	Able to input their enquiry to CSS via the on-line form. Receive e-mail responses re. ineligibility and incompleteness where relevant. Receive answers to enquiries by e-mail. Not able to view any database fields.

Since the launch of CSS there have been a number of different versions (called maintenance bundles) of the database. Each version has either increased the scope of the application by for example allowing enquiries to be searched by enquiry number⁴³, citizen's name and first name and/or helped to improve the functioning of the CSS service by for example including descriptions of the reasons for late replies to citizens. An assessment of user-friendliness needs to centre on whether those who make use of the database find it easy to use, and whether the database allows different types of user to carry out their desired role. This question is considered for each user-type below:

Administrators: DG MARKT has a full view of the service from the receipt to the allocation and answering of each individual enquiry. This level of access gives those responsible for the service a high level of control and full awareness as to how the service is functioning, including the performance of individual experts and the contractor responsible for coordinating the service. This level of control means that those responsible for the service are in a very strong position and there is a reduced risk of inefficiencies in the provision of CSS to citizens. **It can be considered that for DG MARKT the CSS database is sufficiently user-friendly and this view is confirmed by reports from members of staff responsible for CSS.**

Managers: the contractor responsible for running CSS does not have full access to the database, which is reported to have been a frustration in the past. However, current feeling is that **the database allows the contractor to perform its tasks efficiently and effectively and to have full control over its responsibilities to the Commission with regards to the CSS process.** Elements outside the control of the contractor include the performance and

⁴³ This function was added in the 1st maintenance bundle in 2003.

retention of individual experts and numbers of eligible enquiries to the service. However, these aspects fall outside the scope of the database. The contractor has reported that the database functions effectively and there are no major issues of concern. One aspect which has been requested is the possibility to add a free comments field to the database so that the contractor is able to add comments at the time of the attribution of enquiries to experts, which is an aspect that could be considered by DG MARKT. There are also several suggestions with regards to how the on-line form could be improved to enhance the attribution of enquiries to experts, which are either about to be addressed⁴⁴ by DG MARKT or are under consideration. These points are discussed below in the assessment of the user-friendliness of the on-line form.

Experts: whilst experts have limited access to the database, their access relates purely to their own individual function, it can be considered that the current set up of the database as an electronic record of each incoming and outgoing enquiry attributed by the contractor to an individual expert allows CSS experts to work effectively. However, experts' ability to provide high-quality responses is determined to a great extent to the ability of the citizen to explain the precise nature of his or her enquiry, its context and any steps already taken. For this reason it has been requested that **CSS experts are able to request further information from citizens and the most efficient way of doing this (from the point of view of transparency and control) would be to add additional fields to allow this process to become automated. This function could be added to increase the user-friendliness of the database from the point of view of CSS experts.**

Citizens: enquirers to CSS are not able to see the database behind provision of the service, but they are affected by entry to the database and e-mails generated by the site. The fact that the database automatically attributes a unique number to each citizen's enquiry, as well as a deadline by when the enquiry must be answered (even if citizens are not aware of the latter aspect) can be considered to be user-friendly. To this is added the fact that there is no possibility of citizens' enquiries being lost or not answered, which are important facets of the service. However, occasionally, citizens do not receive e-mails sent from the database because of the anti-spamming tools installed on their own computer. **It appears that the database is sufficiently user-friendly.**

4.4.5.2 The CSS web site

The website is comprised of 11 pages, including:

1. Multi-lingual access page (<http://europa.eu.int/citizensrights/signpost>)
2. Welcome to the Citizens Signpost Service (homepage http://europa.eu.int/citizensrights/signpost/front_end/index_en.htm)
3. What kind of question can I ask? (eligibility requirements)

⁴⁴ Sometimes citizens' enquiries do not necessarily fit the model required by the on-line form of the country where a problem arose and the country where a problem relates to.

4. An electronic enquiry form (to ask a question to a CSS expert)
5. Confirmation of submission page
6. About this site (description of the service including access methods)
7. Contact page (an e-mail to contact CSS management and EUROPE DIRECT)
8. Privacy statement (mailbox)
9. Privacy statement (database)
10. Promo page
(<http://europa.eu.int/citizensrights/signpost/promo/index.htm>)
11. Newsletter (currently on the test server)

It appears that the CSS website aims to be clear and succinct and provides all relevant information required to enable users to make an on-line enquiry to the service. There are relatively few pages on the site and, from this point of view, it can be considered to be functional so as to allow users to focus on completing their enquiry.

Perhaps one of the most user-friendly aspects of this site, which is particularly significant given its broad target group, is the fact that all information is available in all 20 European Community languages. This is a strength of the site and makes the site and the service potentially available to EU citizens living in 25 Member States. Other useful aspects of the site include the breadcrumb trail at the top of each page, which allows users to see the route that they have taken to reach their current page, as well as to link directly to different parts of the trail. The sans serif font and use of large, bold titles summarising the contents of the different pages (when this is used) help to convey the service provided to citizens and are consistent with the image developed on other promotional materials. Provision of a contact point with an e-mail address to the Commission and descriptions of who has access to personal data can all be considered to be user-friendly. Use of a common banner at the top of each page helps to establish the identity of the site and a back-to-top button is also useful. If individual pages are printed from the site, the current structure allows users to print pages which make the whole page content visible.

The CSS web site makes use of a wizard-type approach to guide users via two explanatory pages before they are able to complete an on-line enquiry. Thus users are required to pass information on eligibility and the scope of the service before they complete an on-line enquiry. This 'tunnelling' approach has been deliberately adopted to try decrease the numbers of ineligible proposals received by CSS. Indeed the 10% increase in the number of eligible enquiries following the launch of a new version of the web site in March 2005 demonstrates the success of this strategy.

The tunnelling effect is highlighted in the below diagram (provided by DG Internal Market and Services) which provides an example of how web site browsers ‘self filter’ as they click through to the on-line form.

Clickstream on CSS website

November 2005

citizensrights /signpost		index language	eligibility	e-form	end	Total recorded in the DB
425	cs	158	24	20	7	6
	da	156	31	23	8	8
	de	694	162	172	56	71
	et	98	34	26	4	5
	el	194	51	42	14	18
	en	965	262	245	61	115
	es	462	116	100	15	20
	fr	530	147	152	39	69
	it	389	91	74	15	30
	lv	95	13	1	0	0
	lt	175	24	13	3	5
	hu	150	41	27	4	6
	mt	76	9	3	0	0
	nl	332	110	113	35	38
	pl	273	87	77	23	31
	pt	221	57	41	12	22
	sk	108	29	19	5	6
sl	114	17	5	1	0	
fi	166	68	59	4	7	
sv	174	57	38	5	13	
	5530	1430	1248	311	470	

Web sites are dynamic in nature and it can be considered that the CSS site could be made even more user-friendly in a number of ways. These are outlined below:

Navigation and structure: for nearly all pages, except the contact page, users of the site are required to scroll down the page to read all of the contents/see all of the links. This is not particularly user-friendly and does not represent good practice, particularly for the homepage. The site contains a number of links and these seem to fall off the page top left and right hand corners and at the bottom middle part of the page.

The url for the CSS site has been allocated by those responsible for EUROPA. However, comparison with the simpler urls used by Europe Direct and SOLVIT suggests that the url is more complicated than it needs to be. The homepage is available at the below url, which raises the question as to the need to include ‘front_end’:

http://europa.eu.int/citizensrights/signpost/front_end/index_en.htm

...which can be compared with the simpler urls used by Europe Direct:

http://europa.eu.int/europedirect/index_en.htm

and SOLVIT:

http://europa.eu.int/solvit/site/index_en.htm

Presentation: the site is rather monotone in colour, which allows for consistency, but means that it is not visually interesting for users. (It is noted, however, that it may be possible to adapt the site to the yellow/gold palette that was developed for the new CSS stand.) In some cases, use of boxes, shading and more subtitles (where these are not already used for example on the homepage), would help to break up the page and make it easier to understand and focus upon the key points that each page is trying to communicate. In this respect, the 'About this site' page seems to use subtitles effectively. It is suggested that the homepage and the 'What kind of question can I ask' page would benefit from being refreshed so that they are more attractive to the eye and thus easier to understand.

Although the web site concerns citizens and the DG's External Communication Strategy puts and emphasis on dialogue with citizens this is not currently conveyed by the images on the site. The site could be made to come alive if for example photos or more brightly coloured images were included on the site. While there are concerns that this may make the site too 'heavy' to access, there are many examples of other sites⁴⁵ on EUROPA which make use of photos and nowadays even those with dial-up rather than broadband access to the Internet can usually access sites with photos relatively quickly. Of course there is a cost related to changes to the web site and the service will need to identify whether the allocated budget may be used in this way. However, it can be considered that this would be a good use of funds, particularly as internally a more visually stimulating web site would help to put the service on the map.

Content: the strength of the CSS web site is that it is **available in 20 EU languages**, which makes it accessible to its target group in 25 Member States. However, with regards to current content, the content of the CSS homepage, in particular, is not user-friendly and should be improved. The text starts with a series of questions, when it should start with a succinct description of what the service actually is. Furthermore, whilst the homepage informs citizens that the service is free and that replies are provided by multilingual experts by telephone and e-mail it does not state what citizens have to do to be involved or quite simply that they may ask questions to CSS to help them find out how to solve their practical problems as they move around different EU Member States. This problem can be easily rectified. The first section of text under the heading 'What is the Citizens Signpost Service' should be moved from the page 'About this site'⁴⁶ to the homepage.

⁴⁵ For example see the EU at a Glance site: http://europa.eu.int/abc/index_en.htm or the web site for the European Year of Workers' Mobility http://www.europa.eu.int/comm/employment_social/workersmobility2006/index_en.htm;

⁴⁶ This section describes the service not the site, so it is not logical for this text to be placed on a page about the site. About the site should rather relate to the content of the site or be, for example, a site map.

The Commission would like to dialogue with citizens and dialogue is a two-way process. At the moment, users may agree to being contacted at a later date for monitoring purposes but there is no evidence of interaction with citizens presented on the web site. Consideration could be given to adding sections on frequently asked questions, as well as including quotations from users. This would not only be more user-friendly to new browsers on the site, but it would emphasise to CSS' many internal and external stakeholders that the service really does involve a dialogue with citizens. Further information with regards to content is provided in the section related to the clarity of information on the web site below. There are many other suggestions for how to make such a site more interactive, including personal testimonies⁴⁷ of citizens who have used the Commission's services effectively and Frequently Asked Questions (FAQs). FAQs appear to be a standard element on the different web sites of the English, Welsh, Northern Irish and Scottish Citizens Advice Bureau web sites. In addition, a 'What's new section is posted on the homepages' to sum up topical changes to legislation and policy affecting citizens, for example civil partnerships in the UK. A similar section could be added to the CSS site although this is dependent on the ability of the DG to allocate on-going resources to this aspect. It is noted that a step-by-step approach is likely to be required in that given that all textual changes need to be provided in all 20 Community languages. **In conclusion, the presentation and content of the CSS web site are not sufficiently user-friendly and need to be improved. However, it must be understood that budgetary limitations are likely to restrict this aspect.**

4.4.5.3 THE ON-LINE FORM

To assess the user-friendliness of the on-line form it is necessary to make an assessment from two perspectives: the needs of the enquirer and the needs of the contractor/expert.

For enquirers who use the on-line form to make an enquiry, it can be considered that the presentation and structure of the form are relatively user-friendly. A large font is used, the form is relatively short, questions are grouped under appropriate headings and scroll down menus are used to make it quicker for citizens to input data relating to nationality, language, time and dates. The fact that citizens are asked to indicate the date by when they would like a reply can be considered to be extremely user-friendly. A comparison with a similar form on the Northern Irish Citizens Advice Bureau web site reveals that the Northern Irish CAB does not indicate a date by when an answer will be provided and provides less information with regards to how to formulate an enquiry as highlighted in the box below:

⁴⁷ For example, see the personal testimony including photograph entitled 'Thanks Euroconsumer' on the following web site: <http://www.euroconsumer.org.uk/index.htm>

ON-LINE FORM INSTRUCTIONS FOR HOW TO FORMULATE AN ENQUIRY	
<i>Citizens Signpost Service</i>	<i>Northern Irish Citizens Advice Bureau</i>
'Please explain your enquiry with all the significant details in order to allow CSS legal experts to better identify your problem and provide you with a more relevant reply. Which elements of your professional and/or personal situation might be important in finding a solution to your concern? What steps did you already take before contacting us? Which authorities have you been dealing with?'	Client Query / Situation (Please enter as much relevant detail as possible):

There are other differences between the forms, which are interesting to note below:

COMPARISON BETWEEN ON-LINE FORMS	
<i>Citizens Signpost Service</i>	<i>Northern Irish Citizens Advice Bureau</i>
Compulsory field on economic category	No field on economic category
Compulsory field on age includes 'not available' option	Compulsory field on age range – citizens have to select a choice.
No postal address fields	Details of residential address compulsory
Choice between e-mail or telephone compulsory	No field for e-mail address and telephone number not compulsory field.

Based upon the above comparison and overall analysis of the on-line form it can be considered that from the users' point of view the on-line form it is relatively user-friendly, particularly as it is available in 20 languages. TEP suggests that to give real added value to citizens using the web site/on-line form adding a link entitled 'Fact sheets' on the on-line form page could help to reduce the number of ineligible enquiries and would be particularly user-friendly. In addition, adding links to FAQ would also be user-friendly.

Despite the above, there is some evidence that small changes to the on-line form would further enhance the extent that it is user-friendly. Analysis from the CSS contractor and experts suggests that the way that enquiries are entered into the on-line form leads ECAS to assume that citizens find it difficult to distinguish between where an enquiry arose and to which country it relates, as sometimes it is not possible to make this distinction due to the nature of this enquiry. However, at the time of writing it can be reported that this issue will soon be resolved, as DG MARKT intends to modify the form so that citizens can select the country/s that the issue 'most' relates to. This new feature will be added as part of the next update (maintenance bundle 3) to the database, which is planned to be implemented in February/March 2006.

Consultants working on the Mystery survey exercise were asked to provide feedback on the CSS web form and the process of submitting an enquiry. The feedback has been summarised and is presented below.

Initially, consultants were asked how easy they found the following aspects of the CSS website to understand.

- *How the Citizens Signpost Service can help me;*
- *What type of service is available;*
- *Who the service is targeted at;*
- *How to use the enquiry form.*

Overall, there was positive feedback in that each of the above aspects was considered easy to understand on the CSS website. When asked specifically about the CSS web form the general consensus was that it was easy to use and intuitive. However, there were several comments and suggestions made that should be taken into consideration:

Reply Time Drop Down Menu: the CSS web form incorporates a user friendly Reply Time drop down menu which is simple and easy to use. However, there is no indication as to what time zone the drop down menu relates to. Due to the fact there are several time zones within the EU, it may help users if they knew that the times related to CET/GMT or to the local time of the country from which they have made the enquiry. This is not an issue for email responses but it may make it clearer for users awaiting telephone calls from CSS experts.

Email Address Text Field: presently, there is only one email text field on the CSS web form. This means that if a user was to accidentally make a mistake when typing in his/her email address, the CSS confirmation email and response would not reach the correct mailbox. This is frustrating for the user, as they believe that CSS has not responded and for CSS, represents a waste of resources and negatively affects its reputation.

To help prevent this from happening many web forms have two email address text fields and ask users to type their email addresses twice. Code behind the text fields ensures that the email addresses match. If they do not match an error message will highlight this and the user will not be able to submit the form until the email addresses match. Additional code should also be used to prevent users from copying and pasting their email address from the first to the second email address text field.

Although this is an additional field for users to have to fill in, this approach is common practice and is generally understood and accepted by internet users. In the case of CSS it also ensures that the full cycle of the service is completed.

With regards to **CSS experts and the CSS external contractor**, there are a number of small changes that could be made to enhance their task within the service. The CSS web form contains two telephone number text fields which are useful for users. In both cases, there is also the option to include an extension number which again may be practical for some users.

One aspect that is not clear on the form is what telephone number format users should type in. For example, are they supposed to put in their country code or just their telephone number with the area code? It may be useful to specify on the web form what is required and provide an example. This should help users understand what telephone number format is required.

Overall it can be considered that the on-line form is relatively user-friendly from the point of view of both end users and service providers.

4.4.6 IS INFORMATION ON THE CSS WEBSITE CLEAR?

The information provided on the website is quite clear in that it allows citizens to make an enquiry to the service in any one of 20 Community languages, explains that the service is free of charge and that enquiries may be made by telephone or via the CSS web site. However there are a number of aspects that limit the clarity of the website, as follows:

- EU jargon
- The way that other services are referred to
- Too much information
- Too little information

EU jargon: it should be assumed that most members of the general public do not understand the term 'Internal Market' and, therefore, do not understand to what 'Internal Market rights and rules' relate. There is a need to explain this term succinctly. In fact, given that there are references to a number of other services on the site, it would be useful to include a 'definitions' page to clarify these aspects.

The way that other services are referred to: there are many references⁴⁸ to other services or web sites organised by the European Commission in the text of the site, for example: Your Europe, Europe Direct, FIN-NET, SOLVIT. It is understood that these references are important because DG MARKT would like to explain how CSS complements and has synergies with a number of other services. However, inclusion of these references in the text is confusing to users and sends users off to other services when the site should focus on explaining the signpost service. This confusion is increased because none of the names of the other services are self-evident; for example, it cannot be understood from the name FIN-NET, the type of service that is provided, and the services offered by FIN-NET are not explained. It is suggested that there are several ways around this problem. As highlighted above, a page on definitions which describes each available service could be added. A link to the different services could be added

⁴⁸ (It is understood that those responsible for the service were required to include these links on the CSS site).

to the suggested navigation bar⁴⁹ in the left hand margin. A diagram of the way that different services interlink could be added to the site, this could be added to a page on definitions.

Too much information: citizens do not need to be informed of the detailed processes at work to provide the service. Such information does not enhance citizens' ability to make an eligible⁵⁰ enquiry and makes the text appear fragmented. There are a number of examples of this information on the 'About this site' page. The page explains that *'...questions are sent to the contractor: European Citizen Action Service (ECAS)...ECAS transmits the eligible enquiries to one of its legal experts'*. This information does not need to be explained to citizens who just need to know that they input their enquiry and it will be answered by an expert in the language of their choice. There are several references to SOLVIT and FIN-NET as example of where citizens may be signposted. Again, TEP suggests that it adds to confusion to give these examples of acronyms which then lead browsers from the site. It is also suggested that it would be clearer if instead of telling citizens to call 'Europe Direct' they were asked to *'call the Commission's information help desk on the free phone number...'*. The overall message is that there is a need to avoid references to acronyms if at all possible.

Not enough information: this aspect relates particularly to the description of eligibility provided on the web site. A key piece of information that is currently missing is the fact that the service will only be able to advise citizens questions whose requests are judged to be eligible, and that citizens making an ineligible request will receive an e-mail informing them of other potential sources of information. The lack of this information is likely to lead to increased frustration for citizens, who are informed that their request is ineligible.

The need to improve and increase information on eligibility is confirmed by the high number of ineligible enquiries that have been received to date by the service. Between July 2002 and September 2005, excluding incomplete and duplicate enquiries, just over 27% of enquiries were ineligible. It is suggested that examples of eligible and ineligible enquiries could be helpful, for example to explain the difference between a specific and general enquiry.

⁴⁹ There is currently no left-hand menu on the site. This is proposed in the section on user-friendliness of the site.

⁵⁰ However, as highlighted earlier, the tunnelling of citizens through descriptions on eligibility and scope of the service to the on-line form has had the impact of increasing the eligibility of enquiries by 10%. Average eligibility is currently at circa 80% and reached a high of 89.8% in October 2005.

4.4.7 ARE TECHNOLOGICAL IMPROVEMENTS REQUIRED TO MEET CITIZENS' NEEDS?

Taking into account the needs of citizens and the evolution of Information Technology, in what way could the service be improved?

With regards to the needs of citizens, it can be considered that the Citizens Signpost Service provides a fast and flexible enquiry service in 20 languages by telephone or e-mail. All eligible enquiries receive a response within 8 working days through a system which has an in-depth quality assurance procedure to ensure that high quality (clear, accurate, relevant and enabling) responses are provided to citizens so that they are empowered to solve their problem. There is no evidence to suggest that the level and scope of service provided is available at the Member State level. It can be considered that the service meets the needs of its users and this is backed up by the results of the on-line survey provided elsewhere in this document.

However, there is a major barrier to the ability of the service to meet the needs of EU citizens and this relates to the low levels of awareness of the service across the EU Member States. In effect, low awareness results in low levels of enquiries and means that citizens who could be helped by the service are not aware that the service exists. **Thus it can be concluded that the service meets its users' needs but only partially meets the needs of its target group EU citizens in mobility.**

Information Technology is evolving, resulting in new and more sophisticated mechanisms for the transfer of text, sounds and images. However, whilst technology is evolving, it should be remembered that not everyone in the EU even has access to the Internet⁵¹. This is highlighted by a report on an EU news website that⁵² a recent Eurobarometer study that finds that 57% of EU consumers would not consider shopping on-line because they have no Internet connection.

As CSS is a public information service and the general public has varying levels of access to technology, the service should aim to make information as simple and accessible as possible. Therefore, it is necessary to provide different advice distribution mechanisms. **For the time being, the current forms of communication used by the Citizens Signpost Service can be considered to be the most appropriate to meet citizens needs.** There may be some interest for the general public to receive advice on a face-to-face level and this is

⁵¹ According to the following site on Internet penetration:
<http://www.internetworldstats.com/stats4.htm> the population of the EU is 460,270,935 of which 226,890,982 (49.3%) have not had access to the Internet.

⁵² <http://www.euractiv.com/Article?tcmmuri=tcm:29-114430-16&type=News>

something that is currently being considered by DG MARKT. However, given that CSS advisors signpost individuals rather than helping them to solve their difficulties, it is suggested that this type of advice can be provided via the existing advice mechanisms. Whilst a comparison with the citizens' advice services at the Member State level for example Comhairle in Ireland and the Citizens Advice Bureau in the UK, which aim to help individuals to solve their problems principally via face-to-face contact, telephone and e-mail.

4.5 EFFICIENCY OF CSS

4.5.1 ARE HUMAN AND FINANCIAL COSTS DEPLOYED REASONABLE?

To what extent has the service achieved its objectives at a reasonable cost in terms of human and financial resources deployed?

It is important to note that a key way of assessing the extent that the cost of the service is at a reasonable level would, in theory be provided by a comparison of the precise cost of equivalent services either provided by other European Commission services or provided at the national level. **However, this exercise is limited due to the fact that there is no equivalent service at the European or national level against which the human and financial resources used to provide the Citizens Signpost Service can be benchmarked.** It must be considered that CSS provides a specialist service, in terms of the scope of the service:

- No other Commission or national-level service provides advice and interpretation of EU Market legislation to EU citizens and signposting, covering all 25 Member States and in 20 languages. Whilst the Eurojus service, managed by DG PRESS, provides advice on a range of matters including the Internal Market legislation, the service is only available in 12 Member States, the service is not on-going, in that experts work between defined hours each week, and there is no guaranteed response time to citizens' enquiries.

and in terms of the mechanism of service delivery:

- The CSS is a semi-centralised service delivered by a single subcontractor that organises the work of a team of self-employed experts. Europe Direct provides a close comparison, but with a key difference that Europe Direct agents are generalists who are paid by the subcontractor rather than working on a fee per enquiry basis. Meanwhile, the national-level citizens advice services operate using predominantly unpaid volunteers (not paid legal experts). This allows the national services to have a large network of local advice centres.

Despite the limitations to the calculation of the reasonableness of resources required to provide CSS, a wide range of qualitative and quantitative data was taken into account. However, most of the calculations were based on estimates and comparisons with similar but different situations. The cost benefit analysis takes into account the following data sources:

1. The value and cost structure of the contract between DG MARKT and ECAS in comparison to the outputs of the service to date.
2. Comparisons with other complementary services at the EU and national level on the global cost of delivering an enquiry service and the numbers of enquiries/cases that are answered, as highlighted in the table below.
3. Costs of commercial 'off the high street' advice in two Member States (northern and southern)
4. Allocation of human and financial resources by the contractor (ECAS).
5. Allocation of human and financial resources by DG MARKT.

1. The value and cost structure of the contract to deliver the CSS

The assessment of the contract does not relate to the level of service provided by ECAS and is not an assessment of the contractor. The choice of contractor has been made via a competitive tendering process and the contractor is selected taking into account a best-price value. The Commission's decision to draw up the contract is based on a value for money judgement.

The contract is structured as follows:

PAYMENT BASIS	CONTRACT COVERAGE	COST PER ENQUIRY
Fixed-fee	1 st 6,000 eligible enquiries, unlimited ineligible, incomplete and duplicate enquiries and provision of service in all 20 languages covering all 25 Member States	€137
Fee per enquiry	Up to 5,000 additional eligible enquiries	€40

According to the contract, a fixed rate is paid for the operation of the CSS in all 20 Community languages, the first 6,000 eligible enquiries, and unlimited ineligible, incomplete and duplicate enquiries. For each eligible enquiry answered over 6,000 the DG pays a unit cost per enquiry up to a threshold of 11,000 eligible enquiries. There is a significant difference of **over €100 per enquiry** between the cost of providing the first 6,000 eligible answers, and the cost per enquiry of the additional 5,000 eligible answers. In fact, **the first 6,000 enquiries are four times more expensive than any additional eligible enquiries**. Whilst

it can be argued that the first fixed-fee relates to the cost of providing and maintaining a high-quality service that answers enquiries within 3 working days in any of 20 languages, the discrepancy between the costs per enquiry suggests that there is scope to **better define the cost structure of the contract**.

The above argument is strengthened because, since the inception of the service in 2002, the number of eligible enquiries has fallen short of the initial 6,000 threshold and has never been higher than 5,000 enquiries. During the contract period 2004 – 2005, the total number of eligible enquiries was 4988 (a unit cost of €164.8 per enquiry). It seems clear that **there is a need to reduce the fixed-fee threshold in the contract (for example to 5,000 eligible enquiries) until such a point that the annual number of eligible enquiries is consistently higher. This will enable the Commission to increase value for money from the contract.**

2. Comparisons with the costs of other complementary services

As highlighted above, TEP considered a number of other complementary Commission and national services including any financial data available. Although in most cases those responsible for complementary services declined to provide detailed costs of their service provision. Some financial data was available for three services (Eurojus, Europe Direct and Comhairle). This information, whilst not comparative, made it possible for TEP to make some estimate calculations. It is important to understand that the nature of services being compared is very different, thus a true comparison cannot be made.

The costs provided in the below table relate to the cost of contracting out services not the cost of centralised, strategic and general management, for instance European Commission management staff costs are not included below. Similarly, the costs of running Comhairle are not included. Costs for the Irish advice service relate to the cost of providing the Citizens Information Centres, the oasis web site and the national telephone service, not the strategic management, training, quality assurance and policy feedback functions carried out by Comhairle.

SERVICE	SERVICE PROVIDED	ESTIMATE RUNNING CONTRACT VALUE PER ANNUM	ESTIMATE TOTAL OF ENQUIRIES PER ANNUM	ESTIMATE COST PER ENQUIRY	TYPE OF SERVICE
CSS	Specialist legal advice and signposting	<i>Initial fixed rate</i> €822,390 ⁵³ €203,096.05	4988 ⁵⁴	€164.8 ⁵⁵	ADVICE
			6,000	€137 ⁵⁶	
			5,000	€40 ⁵⁷	
Europe Direct	General information, signposting on EUROPA and to other services	€2,500,000	116,400	€21	INFORMATION
Eurojus	Specialist legal advice	€508,347	12,780	€40	ADVICE
Comhairle	Information, complaint resolution, dispute resolution	€10,000,000	787,000	€12.7	INFORMATION ADVICE PROBLEM SOLVING

All of the above figures (with the exception of those for CSS) are estimates. There can be differences in the time required to answer enquiries depending on whether a service aims to solve citizens' problems or purely provide information and advice. In some cases, enquiries are handled quickly because they relate to simple information requests, whereas for example national citizens advice services such as Comhairle may require a year or more to handle a case.

Workforce: whereas CSS uses legal experts, the majority of other services reviewed by TEP are staffed by generalists and national citizens advice services depend heavily on volunteers (88% of staff in the Irish Citizens Information Centres)

⁵³ The total credit appropriate for the provision of the Citizens Signpost Service during 2004-2005 was €1,025,486.05 (comprised of a fixed rate of €822,390 for the first 6000 eligible enquiries and additional enquiries paid on a cost per enquiry basis up to a total of 11,000 eligible enquiries). However, following performance of the contract, the total amount actually paid was €847,935.96.

⁵⁴ During the contract period 2004/5 responses were provided to 4988 eligible enquiries.

⁵⁵ Calculation based on the fixed rate of €822,390 for the first 4988 eligible enquiries.

⁵⁶ Cost per enquiry for handling the first 6,000 eligible enquiries.

⁵⁷ This calculation is made on the basis of a unit cost per additional enquiry over the 6,000 covered by the fixed fee to the contractor up to an additional 5,000 enquiries.

Coverage: no other national or European advice service is able to provide legal advice covering all 25 Member States in all 20 languages.

Specialists: no other national or European advice service makes available legal experts covering all 25 Member States in all 20 languages. Whilst Eurojus provides legal experts, the service is currently limited in scale to 12 Member States. Other services providing the same linguistic reach make use of generalist staff. National-level advice services draw from centralised information databases to provide information to citizens and would not be able to ensure the size of their network of local advice centres if they used trained legal experts as this would be too costly. CSS is more highly specialised than national CAB services and includes a number of features that are not covered by national advice services.

The below table provides a breakdown of what the above costs are required to cover under each service. It should be noted that there may be other aspects which should be included in this table.

FEATURE	NATIONAL ADVICE SERVICE	EUROPE DIRECT	EUROJUS	CITIZENS SIGNPOST SERVICE
Centralised management of the service included in costs	No	Yes (Techteam)	No	Yes (ECAS)
Centralised filtering and allocation of questions	No	No	No	Yes
Number of languages used to provide advice	1	20	12	20
Number of countries covered	1	25	12	25
Experts required to translate enquiries and answers	No	Yes into FR or EN if not already	No	Yes into FR or EN if not already
Information by e-mail	Yes	Yes	Yes	Yes
Information by telephone	Yes	Yes	Yes	Yes
Face-to-face meetings	Yes	No	No	No
Type of advisors	80% volunteers/generalist advisors	100% full-time paid generalist agents	100% part-time legal experts	100% self-employed 100% legal experts
Experts required to encode questions and answers	Yes into 1 database	Yes all into 1 database, and CSS enquiries into CSS database	No	Yes into 2 databases (CSS and IPM)
Provision of centralised 2-day annual training for all experts including travel and accommodation	No	On-going training provided, but no travel and accommodation costs	No	Yes for 55 experts from across the EU.
Quality assurance included	Yes – via self-assessment; centralised QA exists but is a central management cost	Yes	No	Yes
Legal advice provided	No	No	Yes	Yes

- Eurojus and CSS are the two services that offer the most direct comparison because both use external legal experts to provide legal advice, and cover similar areas of EU legislation. A key difference is that CSS provides a centralised on-line and telephone enquiry mechanism / Eurojus does not facilitate centralised enquiries but does allow for face-to-face meetings.

SERVICE	EUROJUS AVERAGE ALL ENQUIRIES	CSS ELIGIBLE ENQUIRIES TO CONTRACT MAXIMUM	CSS ALL ENQUIRIES ACTUAL COST 2004 - 2005	CSS ELIGIBLE ENQUIRIES FIXED FEE
Average number of enquiries	12,780	11,000	6,785 ⁵⁸	1 st 6,000
Unit cost	€40	€93	€121	€137

The above calculation suggests that Eurojus provides greater value for money. However, CSS goes beyond the scope of the service provided by Eurojus, as follows:

- CSS enquiries are answered within three working days / there is no deadline by when Eurojus enquiries are answered, although experts take into account documentation provided by citizens and therefore, sometimes, require more time.
- CSS provides a service covering 25 Member States / Eurojus covered 11 Member States and is set to cover 12 from 2006 onwards.
- CSS provides a service in all 20 Community languages / Eurojus provides a service in the languages of countries where Eurojus experts are located.
- All CSS enquiries are tracked from enquiry to response and encoded in a centralised database / there is no tracking of Eurojus enquiries
- All CSS enquiries are filtered for eligibility and expert resources are focused on eligible enquiries / there is no filtering of Eurojus enquiries.
- CSS provides a centralised annual 2-day training programme for all of its legal experts / Eurojus does not provide centralised training.
- The cost of providing CSS includes centralised management and coordination of all legal experts including monthly quality assurance and

⁵⁸ This figure is the total number of enquiries (including eligible, ineligible and incomplete and duplicate) received by CSS during the contractual period 2004 – 2005 given that there is no eligibility filter used by Eurojus.

feedback to each expert and reporting to the Commission / there is no quality assurance or centralised reporting on the work of Eurojus experts to DG COMM.

In comparison to Eurojus the Citizens Signpost Service could give good value for money if responses were provided to the maximum number of eligible enquiries allowed under the contract. For just over twice the price CSS would covers twice the number of Member States as Eurojus and provides a whole range of management, coordination and quality assurance tasks that are not included in the cost of providing Eurojus. **However, as highlighted earlier there is a need to reassess the structure of the contract as the fixed-fee threshold is too high. A reduced fixed-fee for a reduced threshold would reduce the cost of each enquiry in-line with the performance of the contract and thereby increase the value for money of the service.**

3. Comparison with the cost of 'off-the-high street' commercial legal costs

If a comparison is made with the cost of commercial legal advice per hour in the Member States then the amount of €137 per enquiry may be considered to be more reasonable. According to CSS experts, the amount of time that each enquiry takes to answer and respond to ranges between half an hour for a simple question, to 1 hour for a question of average complexity and 2 hours for a very complex question. If one hour is taken as the average time to answer each enquiry at the total cost of €137 (circa £93) per question then this can be considered to be broadly equivalent to the cost of commercial legal advice 'off the high street' in the UK, which an estimate provided to TEP costs between £80 - £100 per hour. Meanwhile the cost of similar advice in Italy is lower at circa €65 per hour. Therefore, **with regards to commercial legal services CSS can be considered to be broadly competitive.**

4. Allocation of human and financial resources by the contractor ECAS.

ECAS appears to have relatively minimal human resources: an average of circa 2.5 or under full-time equivalent staff. With regards to the contractor this appears to ensure that maximum resources are allocated to the efficient functioning of the service, including ensuring that the 3 working-day deadline for responses in any of the 20 EU Community languages is respected. Given that there is no control over the number, timing, language and complexity of enquiries that are received by the CSS, the **fact that experts are paid on a fee per question basis is appropriate to ensure that costs are allocated according to the level of service provided** rather than a standard daily rate for example. There are 55 CSS experts who are all self-employed legal experts. Therefore, the Commission is not required to indirectly pay any social security or taxation costs related to the cost of employment of the experts, which again means that experts are paid on a highly cost-effective basis. It must be taken into account that the costs of

employment within the Commission are relatively high. Also, DG MARKT does not have the expertise available in-house to answer the types of specialist questions that are posed to the CSS experts. Therefore, **outsourcing the CSS to an external contractor and external experts is cost effective to the DG**, which could not realistically provide this service at the same level of cost with the same level of expertise if it was required to use internal staff.

ECAS makes another efficiency gain in the utilisation of human resources on CSS in that the majority of management staff are also employed on a part-time basis as experts. This allows management to have a better view of the quality and functioning of the service and means that additional time is not lost by managers trying to understand the work of experts. Further efficiency gains relate to the fact that CSS was transplanted directly into an existing organisation (no setting up or infrastructure costs are required), staffed by individuals with significant experience of providing advice to European consumers and that CSS benefits from the leadership of a senior Director who oversees the work of the service, but who is not a direct cost to the contract.

5. Allocation of human and financial resources by DG MARKT

The below table presents the annual staffing costs of staff allocated to manage the Citizens Signpost Service within DG MARKT. The costs presented are based on gross staff costs by grade of staff, but do not take into account the specific echelon within each grade, as this information was not available.

MEMBERS OF STAFF WORKING ON CSS	MONTHLY STAFF COSTS BY GRADE OF STAFF	FULL-TIME EQUIVALENT	ACTUAL MONTHLY STAFF COST	NUMBER OF MONTHS WORKED	ANNUAL COST PER STAFF MEMBER
Year 2002					
0.5 A/5	6518.82	0.5	3259.41	7	22815.87
1 END ⁵⁹ A	3789	1	3789	7	26523
0.5 B/2	4880.98	0.5	2440.49	7	17083.43
					66422.3
Year 2003					
0.5 A/5	6518.82	0.5	3259.41	12	39112.92
0.25 END A	3789	0.25	947.25	12	11367
0.5 B/2	4880.98	0.5	2440.49	12	29285.88
					79765.8
Year 2004					
0.5 A/5	6518.82	0.5	3259.41	12	39112.92
1 B/2	4880.98	1	4880.98	12	58571.76
0.25 END A	3789	0.25	947.25	12	11367
0.5 AUX A/3	7857	0.5	3928.5	12	47142
					156193.68

⁵⁹ END is used for Detached National Experts and AUX for Auxiliary staff.

Year 2005					
0.5 A*11	8,050.31	0.5	4025.155	12	48301.86
1 B*8	5558.06	1	5558.06	12	66696.72
0.25 END A	3789	0.25	947.25	12	11367
0.5 AUX A3	7857	0.5	3928.5	9	35356.5
			43611.155		161722.08
TOTAL COST OF STAFF TO END 2005					861785.42

TEP is unable to make a comparison between the costs of the centralised/strategic management of the Citizens Signpost Service and that of the other services considered, as this information was not available.

As highlighted above, the cost of tasks associated with the CSS has been off-set to some extent by the fact that the majority of staff work part-time on CSS and part-time on other unrelated tasks. In fact, since the launch of the service there has been only 1 full-time member of staff allocated to the running of the service. As highlighted by the above table the human resources allocated to CSS within DG MARKT represent just under 10% of the total costs required to provide the service. **Whilst on paper this can be considered to be a very reasonable allocation of funds, given the far reaching ambitions described in the objectives of the service, it can be considered that actual staff coverage is quite thin.** Although since the inception of the service the amount of resources allocated to cover staff costs has more than doubled, it can be questioned as to whether current resources are sufficient to a. raise the profile⁶⁰ and awareness of the service – an issue critical to the future of the service- and b. provide strategic analytical input into the Commission's policy-making machine.

With regards to promotion, there are some cheap effectiveness gains that could be made by the service and these are described elsewhere in the evaluation reports. However, unless decisions are taken to restructure the service so that it builds upon other extensive, existing networks, **TEP suggests that the current amount allocated to promotion is insufficient to create real impact and increase the number of people in the EU who know about the Citizens Signpost Service.** With regards to the costs of the database, this can be understood to be an infrastructural cost that is necessary if the high level of precision and quality in service delivery is to be maintained in the future.

Conclusion: with regards to human resources, it can be considered that the Citizens Signpost Service uses a **very reasonable level of human resources** to provide a high-level quality service. With regards to financial resources, if a minimum of 6,000 eligible enquiries is not answered then it can be considered that DG MARKT is not getting the full benefit of the structure of the contract to provide CSS. However, **if 6,000 eligible enquiries are handled each year, the cost of providing the CSS can be considered to be reasonable.** The cost of

⁶⁰ The current staff allocation to marketing and promotion is only 0.25 fte.

circa €137 is competitive in comparison to Member State legal advice costs and the service delivered by ECAS and the experts goes beyond the level of service provided by other Commission services such as Eurojus and in some respects national level services. **If CSS was to meet its full contractual capacity of 11,000 eligible enquiries, then it could be considered that the service would be competitive.**

4.5.2 EXTERNAL RESOURCES: HOW DO THEY AFFECT THE EFFICIENCY OF THE SERVICE?

(ECAS management and staff and 55 legal experts):

The externalisation of the Citizens Signpost Service allows DG Internal Market and Services to make use of expertise that is not available in-house/within the Internal and External Communications Unit A4 and would be too costly to provide if the service was to be run internally. The contractor brings expertise in managing citizens advice provision and interaction with EU citizens, as well as in EU Internal Market legislation; several members of the management team also work as experts. The ECAS management team's legal knowledge allows them to provide in-depth assistance to experts, to monitor the accuracy of replies and to carry out detailed and reliable quality assurance. In addition to monitoring the responses of citizens, the ECAS team play an important role in deciding the eligibility of enquiries and making value judgements with regards to which experts should receive which enquiries. The database is not sufficiently sophisticated to allocate enquiries to experts and to take into account their different expertise. Thus, decisions made by the ECAS team to match experts with enquiries help to ensure the quality of the service.

The size of the ECAS management team is small with each team member allocated a key role in the management of the CSS. The CSS appears to be managed effectively by managers who are very dedicated to the task and frequently go above and beyond what is required under their contract with DG Internal Market and Services. There is good collaboration with the DG and staff at the Commission can have confidence that the Service being provided meets their expectations. The current contractor has witnessed the development of the service over several years and this experience means that efforts have maximum impact and management processes are now finely tuned. Whilst the contract requires that ECAS provides monthly reports and the DG Internal Market and Services team monitors the work of the experts closely, there appears to be less need for such close monitoring by the Commission given that the service runs smoothly.

Fifty-five legal experts are contracted to work on a part-time, self-employed basis answering questions relevant to their expertise. Experts are paid on a fee per question basis, which is the most cost effective way for the Commission/ECAS to use their expertise. The cost of providing the service would be considerably

higher if the legal experts were employed by the Commission to the extent that it may become questionable as to whether such high resources should be allocated. There is another distinct advantage to using external resources, which is that the service retains its independence. Independence is a distinctive characteristic of similar services at the Member State level. It can be considered that it is wholly appropriate for services to citizens to be independent as this enables citizens to feel confident that their enquiry will not be passed on to the 'authorities', without their agreement.

4.5.3 HOW COULD THE COMMISSION IMPROVE COST EFFECTIVENESS?

Consideration of the human and financial resources allocated to the Contactor ECAS and the allocation within DG Internal Market and Services leads to the conclusion that there are no cost-cutting measures required to increase the effectiveness of the service. In fact, it can be considered, that the resource allocation is insufficient, particularly to carry out the task of raising awareness of the service. There may be some flexibility if less emphasis is placed on quality assurance of experts by the Commission team. However, despite this there appears to be a need for a reinforcement of resources either within the DG or at the Contractor to strengthen awareness-raising.

With regards to the contract for the provision of CSS, as highlighted above the number of enquiries received has never met the initial flat fee which is paid for provision of the service and the first 6,000 eligible enquiries. Furthermore, if comparisons are made with other services it appears that the most cost effective edition of CSS would be where all eligible 11,000 enquiries are answered by the service. Thus it can be considered that if more eligible enquiries were answered by the service then the DG would get better value for money from the service. With regards to the initial threshold for enquiries, consideration could be given to a provision for additional tasks to be undertaken by the contractor to raise awareness of the service, for example or to produce policy papers if number of enquiries fall well under the threshold.

4.6 COHERENCE OF CSS

4.6.1 IS CSS COMPLEMENTARY TO OTHER SOURCES OF INFORMATION AND ADVICE?

4.1 CSS is a service in an area where many other complementary/similar services exist. To what extent is CSS complementary to other alternative sources of practical information/advice provided by EU institutions/Member States? What is its added value? Compare to decentralised services also at national level.

For the purposes of this exercise, the following EU services were considered: Eurojus, Europe Direct, SOLVIT, FIN-NET, EEJ-NET, EURES, ERA-MORE and ECC-NET. In addition, the following national level services were considered: Comhairle (IE), Citizens Advice Bureau (UK) and Citizens Advice Bureau (PL). The extent that CSS complements and adds value to each of these services is discussed below.

Eurojus: *Eurojus provides a free legal advice service on the application of EU law to citizens. Eurojus falls under the responsibility of DG PRESS. The advice is provided by part-time lawyers who answer telephone, mail, e-mail and face-to-face enquiries from the EU Representations in 11 (soon to be 12) Member States.*

CSS currently complements Eurojus by forwarding relevant enquiries received by CSS to Eurojus agents. However, given that to some extent the services cover the same areas of EU law (Eurojus lawyers advise on all EU law including that related to the Internal Market) it can be considered that there could be even greater synergies. Those responsible for Eurojus consider that Eurojus experts would benefit from the annual training, which is provided to CSS experts.

TEP suggests that there could also be scope for the CSS to benefit from the location of Eurojus experts in the Member States. Whilst this is currently limited to 11 Member States, there could be scope to join forces/link CSS experts and Eurojus experts, in the Member States where Eurojus operates. In one current example (Ireland) a CSS expert also works as a Eurojus expert. Joining forces between the services could have a number of benefits. It could allow:

- the Commission to fund a number of full time posts in the 11 Member States, in addition to the part time posts provided by CSS in the other 14 Member States, rather than part time Eurojus experts and part time CSS experts in these countries;
- CSS to extend its mechanisms for the provision of advice, so that it includes face-to-face meetings with citizens;
- Both services to strengthen their efforts and budgets to raise awareness of the free services available to EU citizens.

Added value: the Citizens Signpost Service adds value to the Eurojus service by forwarding complex queries that could benefit from a face-to-face meeting with a lawyer to the Eurojus expert in the relevant service. As highlighted above, CSS could increase its added value to Eurojus, if Eurojus experts were able to also take part in the annual training provided to CSS experts. To some extent, CSS can be considered to add value to Eurojus in that CSS is available to citizens in all 25 EU Member States and in all 20 official Community languages, whereas Eurojus is available in 11, soon to be 12, Member States and does not provide the same extent of linguistic coverage. Furthermore, Eurojus does not benefit

from a central multilingual web site to inform citizens about the service that is available.

Europe Direct: *is the public helpdesk of the European Commission, which aims to help callers to the Commission who have questions in relation to information on the EUROPA portal and with regard to EU institutions, legislation, policy, programmes and funding opportunities.*

Europe Direct and CSS complement each other well, in that Europe Direct as the main entry point for enquiries to the Commission also provides the entry point for all telephone enquiries to the Citizens Signpost Service. In addition, Europe Direct encodes e-mails received via the Europe Direct mailbox, Scad plus and Your Europe mailboxes, which are relevant to CSS into the CSS database. The fact that Europe Direct has access to the CSS database highlights the high level of synergy between the services. Synergies are also strengthened because both Europe Direct and CSS provide free services in all 20 EU languages. Another important aspect of the synergies between CSS and Europe Direct come from the fact that the operators of Europe Direct strongly rely on the Your Europe portal information (guides and practical fact sheets) to supply their replies to the public. Historically, CSS and Europe Direct (and also the Citizens First information which then became Dialogue with Citizens, before conversion to Your Europe) were intimately linked since their creation by DG MARKT in 1996.

However, despite the above, there is great scope to increase the degree of synergy between the services in the area of presentation and promotion. Currently, there is no real mention of CSS on the Europe Direct web site. Given that Europe Direct is the earpiece of CSS this is a major problem to be addressed. The Europe Direct web site needs to clearly state that *'Europe Direct will also transfer citizens' calls who require help to solve a cross border issue, such as...'*. There is also scope for discussion on common promotional strategies and how to send a strong message to citizens about the type of help that is available, particularly as DG PRESS manages a network of Commission Representations in the Member States who can be harnessed to send local messages to local audiences. Also, there is little sense not promoting these services jointly as this will maximize the impact of awareness-raising.

Added value: CSS adds value to Europe Direct as it provides a mechanism to answer citizens enquiries that relate to concrete problems under the Internal Market. The service provided by CSS goes beyond the remit of Europe Direct, which acts as a general Commission helpdesk and is mainly focused on helping citizens to obtain their desired information from the EUROPA portal. CSS provides Europe Direct operators with a channel to pass on queries that they are unable to answer themselves because they have a more generalist profile. The fact that both CSS and Europe Direct are available in the same number of languages allows a clean fit between the services.

SOLVIT: *is a network of contact points in the administrations of EU Member States who provide a free service to citizens and businesses that need to solve a problem due to a misapplication of Internal Market law by public authorities.*

CSS and SOLVIT complement each other well. When relevant, CSS experts signpost EU citizens to the SOLVIT network, which then seeks to solve the citizen's problem. Whilst both services cover Internal Market law, CSS is an information and signposting service, which does not aim to solve citizens problems, whereas SOLVIT is set up precisely to resolve the problems of citizens and businesses. The creation of synergies between the services is helped by the fact that they are both coordinated by the same Directorate General, they are both free and they operate in all 25 Member States. In the past, the two services have also combined their efforts in the production of a common promotional leaflet.

The degree of complementarity between the services is soon to be strengthened as a link is foreseen between the CSS database and SOLVIT so that enquiries can be transferred automatically. It is considered by those responsible for SOLVIT that there could also be possibilities for joint training on updates and developments to EU Internal Market legislation, and this is something that could be explored in the future. Given that both services are organized via DG MARKT it is suggested that there is also scope for a common brand so that differences between the services are not necessarily highlighted to citizens.

Added-value: the Citizens Signpost Service adds value to SOLVIT by directing a number of cases to the SOLVIT network, when it is considered to be relevant to the citizen's enquiry. In turn, the CSS is able to provide specialist legal back up to SOLVIT experts, who are not usually lawyers and do not necessarily know the intricacies of Internal Market legislation. CSS also provides SOLVIT with an opportunity to identify who enquiries should be redirected to if they fall outside the scope of SOLVIT.

FIN-NET: *is an out-of-court complaints network for the financial services that is available to citizens and businesses in the EEA, who have a complaint about financial services received from a scheme in another Member State.*

The scope of services provided by FIN-NET and CSS is quite different. Whilst CSS is free, available in all 20 Community languages and focuses on citizens rights within the Internal Market, national FIN-NET advice providers may charge for their advice and can decide in which languages they will accept enquiries and provide responses. Thus even though the two services are coordinated by staff within the same Directorate General of the Commission there is currently little complementarity between the services. There is some scope to improve this situation if, for example, CSS was to produce targeted information that could be disseminated to clients of the FIN-NET network.

Added value: CSS potentially adds value to FIN-NET by signposting relevant queries to national FIN-NET advice providers. In this way, CSS provides a centralized Commission entry point for FIN-NET and adds value by pre-assessing whether the enquiries that it receives could be best solved by FIN-NET, before forwarding these to the network. This acts as a filtering service for FIN-NET. However, it should be noted here that the majority of enquiries received by FIN-NET are not forwarded by CSS.

EJN: *the European Judicial Network in civil and commercial matters is a decentralised network, which aims to provide services to individuals, companies and those in the legal profession, who need to access information and knowledge about the various national systems of civil and commercial law and the legislative instruments of the European Union and other international organisations including the United Nations, the Hague Conference and the Council of Europe*

There is a high degree of complementarity between CSS and the European Judicial Network, as CSS is able to signpost citizens to the services of EJN. In this way it can be considered that CSS provides a service which supports the European Judicial Network.

Added value: as highlighted above CSS has the potential to add value to the EJN by signposting citizens to the network.

EURES: *is a decentralised network of public employment services for international recruitment, in all 25 Member States and 3 EEA countries, which aims to promote EU job mobility. The network is staffed by some 650 advisors who work between a ¼ full-time equivalent (fte) and an fte basis.*

EURES is more specific in terms of focus than CSS. Whilst both networks answer questions related to living and working in different Member States and social security and taxation, the focus of EURES activities is to support the take up of employment opportunities in another EU Member State, whereas CSS has a broader remit of aiming to help citizens to ensure that they know and are able to enforce their Internal Market rights. CSS can be considered to complement EURES in that it provides specialist legal advice, whereas EURES advisors are more generalist and unlikely to know the details of EU legislation covering the issues on which they provide advice.

Added value: CSS has great potential to add value to EURES by providing specialist advice to the EURES network. Furthermore, CSS has the potential to add value to the work of EURES in that EURES advisors are principally aimed at helping people to find jobs in another EU Member State and CSS can provide support to citizens once they have secured employment if during the course of their time in another Member State they encounter a problem and do not know where to turn for advice. The integrated approach described above, does not for

the moment reflect the way that the two services are interlinked, although on occasion both services escalate enquiries to each other. Enquiries from EURES that are escalated to CSS tend to be those received by the central internet helpdesk rather than those from individual members of the network. For the moment, there are low levels of awareness of CSS and the other Commission information and advice services by the EURES network.

ERA-MORE: *is a network of 200 contact points in national administrations, universities and research-related organisations in 33 countries that aim to provide help and assistance to EU researchers. The work of the network is backed up by an on-line tool the Researchers Mobility Portal that provides details of research opportunities and other advice.*

Those responsible for ERA-MORE see CSS as being in complement to the service provided by the mobility centres. CSS provides legal advice and signposting, whereas the approach of the research mobility centres is more generalist. Whilst there are currently informal links between CSS and ERA-MORE there is scope to strengthen these links. It was reported that access is provided from the mobility centres to the network of experts in CSS, to enable researchers to consult these experts on very specific issues where CSS has greater expertise.

Added-value: CSS has the potential to add value to ERA-MORE as the CSS service provides specialist legal advice that covers some of the areas of client concern dealt with by the ERA-MORE network. CSS could add even greater value to ERA-MORE if it could be used as a resource for legal advice and signposting to allow the ERA-MORE to check the legal position of its users. Currently, this aspect is considered to be somewhat limited in that CSS is set up to address the needs of individual citizens rather than organisations acting on behalf of their clients. DG MARKT is, however, considering whether there could be any possibility to allow the ERA-MORE advisors to receive copies of the replies that are sent to from CSS to their clients.

ECC-NET: *is a network of national-level European Consumer Centres that are part-funded by the Commission (DG SANCO) and part-funded by the Member State authorities. The Centres aim to provide citizens who have problems with a trader or goods or services in another Member State, with easy access to redress under Internal Market law.*

With regards to the scope that both services provide CSS has the potential to complement ECC-NET well. Both services cover individuals rights under Internal Market legislation and both are able to provide services to citizens in the EU 25⁶¹ Member States. Like SOLVIT, ECC-NET goes beyond the remit of CSS as the network provides complaint and dispute resolution services in addition to

⁶¹ Whilst ECC-NET operates in 23 Member States there are plans for this to be extended by a further 3 countries this year (2006).

information provision, but these tasks are limited to consumer issues. Meanwhile, CSS provides a signposting service which is able direct relevant questions to ECC-NET.

Added-value: whilst there is an obvious potential to link CSS to the ECC-NET, those responsible for ECC-NET have low awareness of CSS, which points to the fact that there is likely to be similar low awareness of CSS among the European Consumer Centres. Given the type of signposting services provided by CSS it can be considered that there is also potential for the ECC-NET to transfer cases that are not relevant for the network, but where CSS might be able to point users to services that are relevant, plus as a resource for legal advice for the ECC-NET.

National-level services: *the Citizens Advice Bureaux in Ireland, England and Wales and Poland provide advice to citizens principally via telephone and face-to-face meetings, but also via fact sheets on dedicated web sites and in some cases via e-mail. Whilst the Bureaux deal with a range of national issues, they also provide services to citizens from other Member States who reside in their country and therefore potentially have difficulties with their cross-border situation.*

In terms of the scope of the service provided the CSS has the potential to complement the work of Citizens Advice Bureaux. The CSS is more specifically targeted than these organizations who tend for the most part to correspond to the needs to their own nationals. Having said this, a small proportion of enquiries received by the CABs come from nationals from other EU Member States. In the majority of cases their questions relate to the national situation of the Member State where they are living rather than the Member State from where they originated. However, when they are unable to immediately answer questions, the CABs address questions to the relevant embassy, or establish their own networks and links to help them to deal with the enquiries of other foreign nationals. Whilst those responsible for the CABs in these countries, see the potential for added value and complement of the CSS, they report that their services are able to deal with the enquiries that they receive. Furthermore, there is low or no awareness of the CSS by the CAB advisors and organisations, which means that any potential for synergies is not maximized.

It should be noted here that the majority of Member States do not provide Citizens Advice Bureaux services or centralised citizens' rights advice services. Therefore, it can be considered that the CSS definitely complements what is available at the national level. Those countries which provide citizens' rights advice services do not provide services that are specifically targeted to deal with cross-border issues and are limited to provide advice in the language/s of the Member States where the citizen is residing rather than where he or she originates.

Added-value: the Citizens Signpost Service can be considered to add value to services that are available at the national level given that there is no equivalent service available at the Member State level. Furthermore, crucially, most EU Member States do not offer Citizens Advice Bureaux services to their citizens. The exceptions are the UK, Ireland, Poland, Lithuania and the Czech Republic. Whilst some other countries may have websites that provide information that could be useful help citizens to deal with national administrative requirements, they are often not targeted to suit the needs of foreign nationals, and whilst some provide an e-mail helpdesk, generally the sites do not provide a telephone helpline. Thus, it can be considered that in the majority of cases there is no structured advice provision that reflects the scope of service provided by CSS.

It is, however, important to take into account that **the services interviewed reported that they are able to answer cross border questions, which raises questions as to the current added-value of CSS to these services. However, these services did report that they believed that CSS could add value if there was greater awareness of what CSS could do.** Those responsible for CSS could consider similar promotional exercises as those carried out by SOLVIT, whereby Commission representatives went to national CABs and gave presentations on the Service, this not only generated a level of awareness it also led to links being established on their web sites. Several of the CABs suggested that CSS could help by discussing how to link in with their national services. Ideas include:

- providing updated information on EU Internal Market legislation, which can then be disseminated to CAB local agencies;
- acting as a specialist legal advice unit that can be contacted by the CABs;
- providing training presentations;
- producing targeted promotional material aimed at the CAB audience and advisors;
- selecting strategic CABs (those located in areas with high numbers of other EU nationals) to act as Euro CABs;
- providing support to Member States considering setting up advice structures.
- finding other ways to piggy back on to the network of services provided.

TEP suggests that if DG MARKT decides to work more closely with national level services, it would be useful to consider how the CSS could be aligned alongside the ECC-NET, which currently has links to several Citizens Advice Bureaux.

In conclusion, it can be considered that CSS complements and adds value to the scope of many complementary services on offer at the Commission and at the national level. However, the potential of the CSS has not been fully exploited and a lack of internal and external awareness means that the degree of complement and added value of the service is not fully effective and could be greatly enhanced.

4.6.1.1 BENEFITS OF DIFFERENT COMMUNICATION CHANNELS

Compare benefits of:

- **Various communication channels (electronic communication versus person-to-person and/or print media (for example information leaflets for the general public);**

Electronic communication: the advantages of this form of communication from the point of view of service providers include speed and reach; the ability to communicate over vast geographical distances. Thus services can be provided remotely and projected to the location of each individual service user. For the purposes of CSS, electronic communication is essentially on-line and by e-mail. E-mail interactions allow individual as well as group interaction, which is relatively confidential and safe for the exchange of content of a highly personal nature. Thus individual citizens can feel that responses provided by CSS are tailored to their personal situation, as e-mails enter their private e-mail in-tray. For citizens wishing to contact CSS other advantages of electronic communication include the visual aspect whereby enquirers are able to see the question that they are asking, are able to pause at any given point whilst formulating their question, and have a record of the question that they posed. Furthermore, e-mail communication is relatively inexpensive and commonly available in public spaces, for those who do not have access at home.

The disadvantages of e-mail and electronic communication is that it can be somewhat impersonal and therefore not appropriate to issues which may be causing a high level of stress and urgent action for which a face-to-face or telephone contact can give a greater sense of relief to the member of the public. Whilst face-to-face communication is much more immediate from the point of view of the enquirer it presents a number of limitations, which include the increased cost of providing an environment suitable to receive members of the general public and the need for enquirers to travel to visit advisors or vice versa. Another clear limitation relates to the availability of enquirers to attend a face-to-face meeting. This would be an issue for the current clientele of the Citizens Signpost Service the majority of which are employed and therefore not likely to be available to attend a face-to-face meeting unless it was in close proximity to their workplace.

Telephone communication can provide an effective alternative between electronic communication and face-to-face communication in that it provides a very personal form of communication to members of the general public. However, again there can be disadvantages. Enquirers do not have a record of their question or the response provided, which may be useful if they later require evidence to defend their case. Another disadvantage is that advisors are unaware of the question that they will be asked and may not be able to provide an answer on the spot. The CSS manages this difficulty effectively by not

allowing enquirers to speak directly to an expert and requiring Europe Direct operators to encode telephone requests directly into the CSS database. However, as it may be necessary to call the enquirer back and there is a risk that the he or she may not be reachable by telephone.

The advantage of print media (such as fact sheets, magazines, newspapers and leaflets) is that it can be disseminated to those who do not have access to the Internet, or who have not come across the EUROPA web site or the Citizens Signpost Service on the web site. Print media also provides a permanent record with fixed text and presentation elements. However, the disadvantage to this media is that once a document has been printed it is fixed and its relevance is limited to the life span of the information that it reports. Other limitations of printed media is that it requires an effective dissemination strategy and channels to reach target audiences and also that the information, which it contains is not user-driven but decided centrally.

- **General versus specialised advice/information centres, others? (e.g. will citizens looking for advice prefer to use CSS rather than a national/local public advice service? On the other hand, will a citizen with problems in exercising his/her rights in the Single Market prefer to consult a national/local source of advice or to address himself/herself to an EU advice service?).**

It should be considered that individual citizens may have their own personal preferences with regards to the format of communication and services that they prefer. However, overall it can be considered that with regards to electronic and telecommunications, provided that citizens are able to receive answers to their questions at low or no cost they will not necessarily be concerned as to whether the scope of services provided are of a general or specialised nature. However, where a service is unable to answer a query, either because the service is unable to handle the content of a question or because the service is unable to use the format required by the citizen (for example telephone where citizens do not have access to the Internet and in the language of the citizen) then there is likely to be lower levels of satisfaction with a service. Consideration of services at the national level highlights that there can be differences between citizens preferences for the format of information and advice in relation to their specific needs. For example, where simple information is required a telephone call or email can be sufficient to satisfy a citizen's needs, whereas a face-to-face meeting tends to be the preferred format for advice where more human/personal support is required to help citizens to deal with situations of urgent and grave concern.

With regards to whether citizens would prefer to use national or European services there are several factors that are likely to influence this decision:

Awareness of the service: currently citizens are more likely to be aware of national level services than European level services. This reflects the fact that national services find it easier to promote their services and are able to build upon established dissemination and promotion mechanisms, whereas European level services find it difficult to communicate with the general public in the European Union.

Degree of user-friendliness: national level services have the advantage of being in touch with the day-to-day realities of citizens' lives within their Member State. National-level services are able to use the every day language of these individuals and citizens may find their approach to be user-friendly.

Perceptions of ease of access: it should be considered that some members of the EU general public will generally prefer to use a national service because they:

- find national service to be easier and more immediate;
- are intimidated to contact the European Commission;
- may have some mistrust of the Commission,
- may have a perception that the Commission is very bureaucratic;
- may find it more complicated to contact the Commission.

Citizens may be more likely to contact the Commission if they cannot find a way to answer their enquiries via a national-level service.

Language and knowledge of the country: if advice services are targeted at the general public then they need to be able to respond to citizens in the language of their choice, and to be able to show knowledge of the situation of the citizen. The Citizens Signpost Service is able to meet this criterion.

4.6.2 HAS CSS AFFECTED PERCEPTIONS OF EU INSTITUTIONS?

To what extent has contact with CSS affected citizens' perceptions of the EU institutions?

By and large, contact with CSS has had a positive effect on users' perceptions of the European Commission. The results of the on-line user satisfaction survey showed that 55% of respondents agreed/agreed strongly that CSS has improved their perception of the European Commission. Seventeen percent of respondents disagreed/disagreed strongly and the remaining 28% opted for a neutral position.

4.6.3 DOES CSS ADD VALUE TO THE DG EXTERNAL COMMUNICATION STRATEGY?

To what extent does the CSS add value to the External Communication Strategy of the DG?

The rationale provided for the DG's external communication strategy includes three points as follows:

1. The duty to tell people what the DG is doing and why
2. The need to increase public and political support for activities
3. The need to improve the Internal Market by helping people to take advantage of it.

These are articulated as three overall objectives, to increase:

- Media, public and political support by clear and simple explanations of what the DG is doing and why;
- Awareness of Internal Market rights and help people to use them;
- Two-way communication to better meet citizens' and businesses needs.

Considering the above points, it can be considered that the Citizens Signpost Service adds value in a number of areas. Most obviously, CSS allows a dialogue between citizens and (indirectly) the Commission/the European Union, as citizens are able to put their questions directly to legal experts coordinated via a DG MARKT contractor and to have a personal interaction with the expert. The option of telephone and e-mail/on-line interaction allows flexibility in this two-way communication and means that those made by telephone also include a real time interaction. This two-way communication can certainly be considered to help citizens to meet their needs better, given that the service is focused on providing practical advice to citizens as to how to solve their problems related to the Internal Market. CSS does not cater for businesses needs (although individual employees may be eligible for assistance from CSS) because their needs fall outside the scope defined for the service and because businesses needs are met by a range of other service both inside DG MARKT and outside. Therefore, this aspect does not reflect a failing on the part of CSS, rather that businesses' needs are met elsewhere.

The provision of assistance and advice with regards to citizens' questions on the Internal Market informs clients of the service of their Internal Market rights and how to use them. It can be concluded that for these individuals CSS raises awareness of Internal Market rights, however, this awareness-raising is limited to users of the service. Therefore, additional efforts are required within the DG if it is intended for greater impact of awareness-raising activities. This aspect is strongly linked to the first objective of providing the media and other information disseminators with clear and simple explanations of what the DG is doing and

why. As pointed out in this report, there is scope for data collected by CSS and the interactions with citizens to be presented in such a way that they may support the media and public relations process. This is an aspect which could and should be exploited by those responsible for CSS.

With regard to the rationale for the External Communication Strategy, CSS can be considered to add value to the third rationale of improving the Internal Market by helping people take advantage of it. The service helps those EU citizens who make contact with CSS to take advantage of their rights under the Internal Market. It is difficult to conclude as to whether and what extent the CSS process helps to improve the Internal Market although it can be suggested that if there was increased promotion of the benefits of the service this could perhaps help to improve the Internal Market. In addition, if there was greater follow-up of particular cases, where the implementation of specific aspects of EU legislation needs to be strengthened, and this was highlighted to representatives of the Member States as well as the EU institutions, this could lead to changes and improvements being made to the Internal Market. In addition, it is suggested that this type of activity could be used to allow CSS to contribute to the rationale that communications should help to increase public and political support for activities. This is a latent strength which CSS could provide to the execution of the DGs External Communication Strategy.

In addition to describing the rationale and objectives of DG MARKT's external communication, the strategy document describes how the following aspects should be used to deliver the following objectives (the added value of CSS to each aspect is then discussed below):

- Messages
- Improving our communications
- Press and media
- Internal Market Europa site
- Single Market News/general publications
- Your Europe: using the Internal Market
- Interactive policy-making
- Events

Messages: the External Communication Strategy describes how there should be consistent messages at four levels: Commission-wide; DG MARKT core messages; sector specific messages; messages on individual policy proposals. The Strategy also describes the DG's 7 core messages. As highlighted in the evaluation reports, there is potential for CSS to add to the execution of the Strategy in several ways, for example key messages could be added to responses sent to citizens by email regarding the benefits of the service and the need for as many citizens as possible to be alerted to the opportunities for advice and signposting offered. With regards to messages on the benefits of the Internal Market, consideration could be given to whether or not to define a slogan or catch phrase that could be posted on the CSS web site, and added to any

promotional material and publications that are produced. Therefore, it is suggested that CSS has the potential to add greater value to the External Communication Strategy with regards to messages, although it appears that new messages would need to be defined because the 7 core DG messages are not sufficiently relevant to CSS.

Improving our communications: this aspect of the Strategy highlights the need for more feedback and evaluation. CSS follows the Strategy as enquiries and responses are currently fed into the IPM database and the on-line enquiry form specifically asks citizens whether they would be prepared to be re-contacted for monitoring purposes. It is intended that the present evaluation will be used to modify the strategy/tools of the CSS. Therefore, again CSS can be considered as following the Strategy. Where CSS does not as yet appear to add significant value is in relation to cooperation with the Member States. This is limited to a certain extent given the fact that many EU Member States do not provide citizens advisory type services, which may limit the scope for cooperation. The fact that the present evaluation involves fact finding at the Member State level with a view to identifying best practice, costs and so on, represents an initial step towards cooperation. However, it is suggested that the opportunity for joint promotion, web site links, or attempts to inform national advice services of the type of service that is provided by CSS and vice-versa could be further exploited.

Press and media: currently the CSS does not appear to add value to the DG's work to entice the press and media. As highlighted in this report there is scope for case studies to be developed, which could be used as press release material, as well as to follow or join up with public relations activities that are pursued by other services for example DG PRESS, for the promotion of Europe Direct.

Internal Market Europa site: most points made in the Strategy with regards to the Internal Market Europa site are not relevant to CSS. However, there is one aspect that could be relevant to CSS: '*Advertise the site prominently in Single Market News, Guides, fact sheets, other DG MARKT*'. A review of the CSS web site shows that there is no direct link to the Internal Market Europa site, and this site is also omitted from the July 2002 – June 2003 activity report, and the July 2003 – June 2004 report. Of course, several other relevant web sites are referenced. However, it is important to note that there is no direct link to CSS on the Internal Market Europa site (though there is a link to Europe Direct) and this must surely be an omission from the site.

Single Market News: here the Strategy suggests that the newsletter should include more original material. It is not clear to what extent CSS data is used in SMN, but this is an area that could be addressed in the future.

Your Europe/IPM/Events: with regards to Your Europe and IPM, CSS appears to be following the defined External Communication Strategy where relevant. With regards to events, to date there has not been an event on CSS which is

targeted at key multipliers and it suggested that this aspect could be considered for the future, particularly to spearhead the launch of a promotional campaign. Such an event could be targeted at the Member States representatives and aim to attract the media, perhaps through personal testimonies of those who have had assistance from CSS, or with a view to encouraging the set up of similar services in more Member States.

Additional issues: the Communication Strategy focuses on the value of using paid media advertising. To date CSS has not made use of this option, because of the cost involved and the limited budget that has been allocated to promotion and communication of the service. However, given the recognition of the effectiveness of paid media as the most effective communication tool and the fact that there has been a decrease in the number of enquiries to CSS in recent time there is a good argument, which is backed up by the External Communication Strategy, for requesting additional budget for this aspect.

5. ANNEXES: THE EVIDENCE

Each Annex is presented in the form of a stand-alone report.

5.1 FINDINGS FROM DESK RESEARCH AND DG MARKT INTERVIEWS

5.2 FINDINGS FROM INTERVIEWS WITH ECAS

5.3 FINDINGS FROM REVIEW OF OTHER COMMISSION SERVICES

5.4 FINDINGS FROM REVIEW OF NATIONAL-LEVEL SERVICES

5.5 RESULTS OF ON-LINE SURVEY OF USERS

5.6 RESULTS OF MYSTERY E-MAIL AND CALLER SURVEYS

6. APPENDICES – QUESTIONNAIRES AND DISCUSSION GUIDES USED